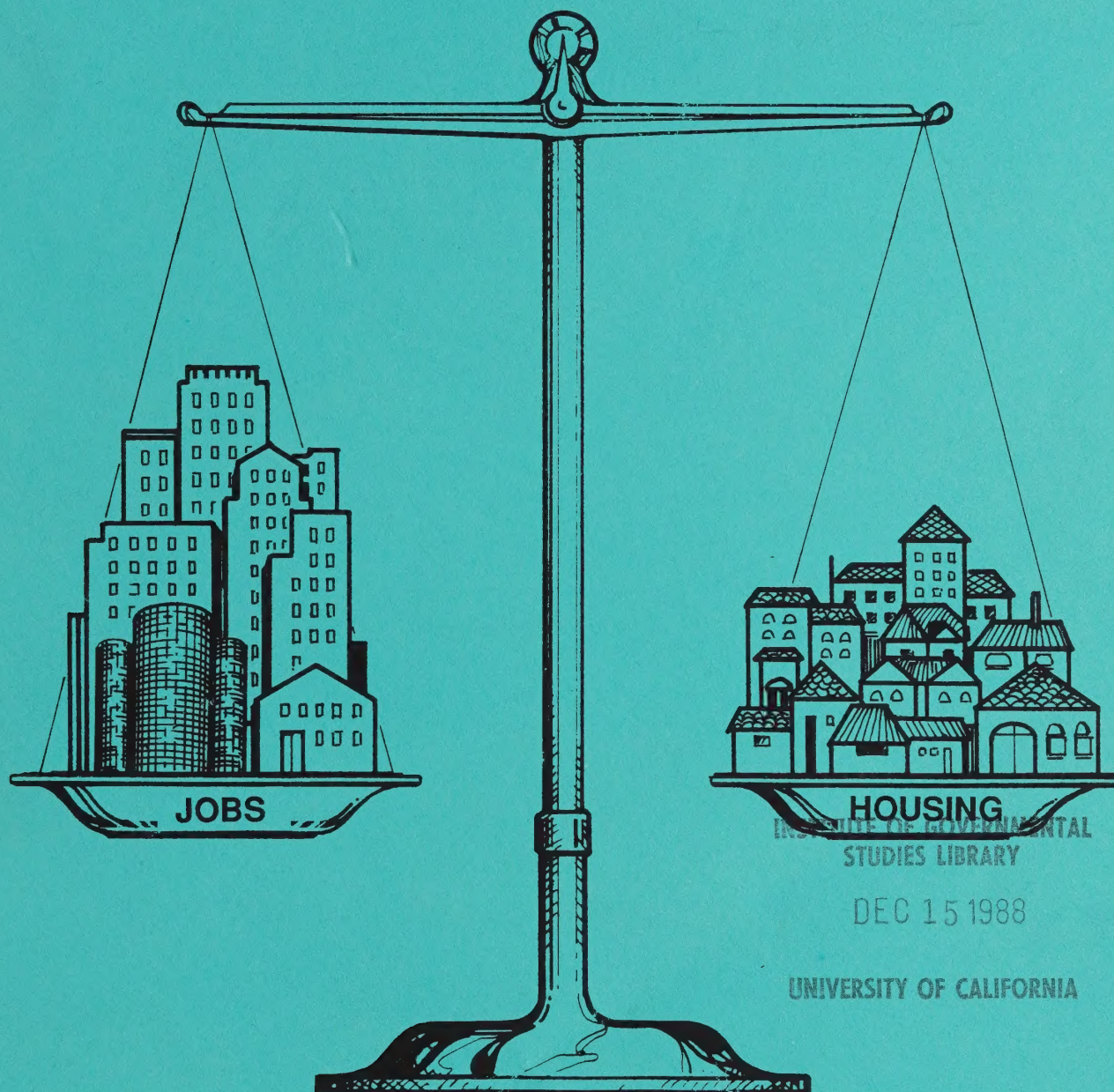


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GROWTH MANAGEMENT PLAN

FINAL ENVIRONMENTAL IMPACT REPORT



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**FINAL ENVIRONMENTAL IMPACT REPORT ON THE
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENT'S
DRAFT GROWTH MANAGEMENT PLAN**

Prepared by:

**Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005
Contact: Paul H. Hatanaka, Principal Planner
213/739-6788**

With technical assistance from:

**Jones & Stokes Associates, Inc.
1725 - 23rd Street, Suite 100
Sacramento, CA 95816
Contact: Debra D. Loh, Project Manager
916/444-5638**

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Management

Mark A. Pisano, Executive Director
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Pat Nemeth, Director of Environmental Planning
Arnie Sherwood, Director of Community and Economic Development
Frank Hotchkiss, Director of Regional Strategic Planning
Jim Gosnell, Director of Transportation Planning
Anne Baker, Director of Government and Public Affairs
Gil Smith, Director of Membership Services

Environmental Analysis Staff

Pat Nemeth, Director of Environmental Planning
Paul Hatanaka, Principal Planner and Project Manager
Delaine Winkler, Associate Planner

Technical Assistance

Viviane Doche-Boulos, Acting Program Manager (Growth Management Plan)
John Oshimo, Senior Planner (Growth Management Plan)
Jim Minuto, Program Manager (Regional Housing Needs Assessment)
Teresa Wang, Senior Planner (Computer Modeling)
Barbara Sullivan, Principal Planner (Air Quality)
Roger Riga, Principal Planner (Transportation)
Judith Hamerslough, Senior Planner (Transportation)
Gail Jensen, Associate Planner (Transportation)
Warren Ferrell, Assistant Planner (Transportation)
Gorden Palmer, Principal Economist
Don Dumandan, Graphics Designer
Elaine Anderson, Administrative Aide (Reproduction)
Pat Cadena, Reproduction Clerk
Cathy Rachal, Reproduction Clerk

JONES & STOKES ASSOCIATES

Al Herson, Contract Administrator
Debra Loh, Project Manager
Ira Saletan, Project Coordinator - Population, Housing, and Employment;
Land Use and Cultural Resources; Public Services
Christy Rogers - Transportation
Wayne Shijo - Air Quality; Noise
Jo Anne Sorenson - Ecological Resources
Zimri Moore - Geology and Hydrology
Kenneth Casaday - Geology and Hydrology
Ron Bass - CEQA Advisor
Victoria Axiaq, Debbie Bloom, and Trudy McDaniel - Word Processing and
Production
Jim Merk and Kenneth McNeil - Proofreading
Tony Rypich and Melody Dorfman - Graphics

CHAPTER 1. PURPOSE AND FORMAT OF THE FINAL ENVIRONMENTAL IMPACT REPORT

Under the California Environmental Quality Act (CEQA), the Southern California Association of Governments (SCAG) is required, after completion of a Draft Environmental Impact Report (DEIR), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project and to provide the general public with opportunities to comment on the DEIR. SCAG, as lead agency, is also required to respond to significant environmental points raised in the review and consultation process.

This Final EIR (FEIR) has been prepared to respond to the public agency and general public comments received on the DEIR for the Draft Growth Management Plan (GMP), which was circulated for public review in October and November 1988. In addition, two public hearings were held before SCAG's Executive Committee on November 3, 1988, and November 18, 1988, to receive input on the adequacy of the DEIR as required by CEQA.

This document has been prepared in the form of an attachment or addendum to the DEIR as allowed by Section 15146(b) of the State CEQA Guidelines. This document and the DEIR, herein incorporated by reference, constitute the FEIR.

This FEIR contains the following chapters:

- o Chapter 2: This chapter includes a revised version of Table 3-1 ("Summary of Proposed Project Impacts and Mitigation Measures") to reflect comments received during the DEIR public review process.
- o Chapter 3: This chapter contains copies of all written comments received on the DEIR and a summary of public testimony received at the DEIR public hearings, as well as SCAG's responses to these comments. The written comments and responses and public testimony and responses are arranged by date. Some comments have been cross-referenced to other responses to avoid duplication. Each comment is numbered to correspond to the numbering system indicated next to the response. Some comments do not relate to the adequacy of the GMP DEIR and are therefore responded to in other documents, as noted. Table 1-1 lists all parties who prepared written comments on the DEIR by date of their letters and their affiliation. This table also lists all individuals who testified at the DEIR public hearing on the adequacy of the GMP DEIR.
- o Chapter 4: This chapter presents "errata" from the DEIR that are amended either as a result of comments received through the DEIR public review process or for clarification. This chapter has been

Table 1-1. Commentors of the DEIR on the Draft
Growth Management Plan

<u>Date of Letter</u>	<u>Written Comments</u>	<u>Commentor</u>
October 31, 1988	William Woolett, Jr. City Manager City of Irvine Community Development Department	
November 3, 1988	Dennis J. O'Bryant Environmental Program Coordinator California Department of Conservation	
November 10, 1988	John Ferraro Council President City Council of the City of Los Angeles	
November 14, 1988	William Woolett, Jr. Acting Director of Community Development City of Irvine Community Development Department	
	Roberta L. Soltz, Ph.D. Environmental Section Head The Metropolitan Water District of Southern California	
November 16, 1988	Keith Turner Manager County of Ventura Resource Management Agency	
November 17, 1988	Bob D. Simpson City Manager City of Anaheim	
	Guy G. Visbal Chief, Transportation Planning Branch Caltrans, District 8	
	Austin Sullivan Senior Planner City of Ontario Planning Department	

Table 1. Continued

	Robert L. Braitman Executive Officer Ventura Local Agency Formation Commission
November 18, 1988	Monica Florian Vice President, Resource Entitlement The Irvine Company
	James C. Gratteau Head, Financial Management and Grants Administration Department County Sanitation Districts of Los Angeles County
	Michael M. Ruane Interim Director of Planning County of Orange Environmental Management Agency
	Ronald H. Smothers Director City of Pomona Development Department
	Richard M. Bobertz Senior Planner City of Redlands
	David N. Reem City Manager City of Santa Ana
	Brian W. Farris Senior Air Quality Specialist South Coast Air Quality Management District
	Kay Martin Manager County of Ventura Solid Waste Management Department

Table 1. Continued

Oral Comments

SCAG's Energy and Environment Committee, October 27, 1988

Robert Farrell, Councilmember, Los Angeles
Bob Kniesel, South Coast Air Quality Management District

DEIR Public Hearing, November 3, 1988

No commentors on GMP DEIR

DEIR Public Hearing, November 18, 1988

Bill Wren, City of Ontario Chamber of Commerce

organized according to the chapters of the DEIR. Those chapters without errata do not appear in Chapter 4.

- o Chapter 5: This chapter contains a bibliography of documents and personal communications used in preparing the FEIR.

United States Department of Agriculture
Forest Service

Forest Management Plan
The following information is being furnished to you for your information and guidance.

1. The purpose of this plan is to provide for the sustained yield management of the forest land owned by the United States Department of Agriculture.

2. The plan is based on the following assumptions:

a. The forest land is owned by the United States Department of Agriculture.

b. The forest land is located in the State of California.

c. The forest land is currently managed as a forest.

d. The forest land is currently managed in accordance with the Forest Management Plan.

CHAPTER 2. REVISED SUMMARY TABLE

Table 3-1, "Summary of Proposed Project Impacts and Mitigation Measures," is hereby amended to incorporate comments received during the DEIR public review period and corrections. Text in standard print indicates original text from the DEIR; text in italics indicates added language; text that has been overstruck is deleted language.

Table 3-1. Summary of Proposed Project Impacts and Mitigation Measures

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
POPULATION, EMPLOYMENT, AND HOUSING	Net increase of 5.87 million persons, 2.67 million housing units, and 3.03 million jobs.	Refer to measures in this and other chapters ; under the following impact categories: population, employment, and housing; public services; transportation; air quality; noise; and ecological resources.
	Proportional decline of the White population and growth of the Hispanic, Black, and Asian/other populations.	Local jurisdictions and other service providers should provide accessible and effective services to members of all ethnic groups in the population, particularly to those that have special needs (e.g., immigrants and lower-income households); and Local jurisdictions and community leaders should support efforts to increase the representation of minority groups among elected and appointed positions where such representation has been substantially lower than the proportion of such groups in the general population; and Local jurisdictions should implement RHNA and other programs that would increase housing opportunities for lower-income ethnic minority households, particularly in areas of the region outside Los Angeles County.
	Growth of the 65+ age group and decline of the 0-17 age group.	Local jurisdictions and other service providers should provide accessible and effective health care and social services to members of all age groups in the population, particularly to those that have special needs (e.g., immigrants, lower-income households, and the elderly); and Public agencies and private organizations should support or provide adequate public education, job training, housing, child care, and public assistance programs for children, families, and younger adults as needed.
	Decreased household size could increase the demand for housing and per capita housing costs and the demand for social services.	Local jurisdictions and service providers should improve and expand the supply of affordable housing, as called for in the RHNA, as well as social services, particularly for single-parent families and the elderly. Measures such as the following could be considered: o identify local housing needs and develop programs to address these needs in conjunction with nonprofit and for-profit developers. Objectives of such programs could include maintaining and improving existing subsidized and below-market-rate housing, constructing new below-market-rate units, providing financial and technical housing assistance to lower-income households, promoting redevelopment projects that improve or increase the stock of affordable housing, and acquiring or reserving sites for affordable housing projects (landbanking);

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
	Potential for decreased housing affordability.	- o expand existing funding and develop new funding sources as needed to support housing programs; and - o implement measures discussed in the "Health Care and Social Services" section of Chapter 6. Refer to measures identified immediately above.
	Growth in the share of employment in the services sector and decline of the share of employment in the manufacturing sector (as well as changes within the sector).	Local jurisdictions, employers, and service agencies should implement measures to upgrade skill levels and adapt to changes in the economy, such as: - o job retraining of low-skilled workers for middle- and high-skilled jobs; and - o job retraining of displaced workers due to structural changes in the economy; and - o improving primary, secondary, and higher education programs to prepare the future labor force for future job opportunities; and - o providing opportunities in small-to-medium sized businesses where most new job creation would occur.
	Continuing Increased jobs/housing imbalance over 1984 among sub-regions and counties.	Subregional and local jurisdictions should implement strategies to improve the regional and subregional J/H imbalance. The following measures could be considered: - o in housing-poor areas, increase the amount and density of planned future residential development and/or reduce the amount of planned future commercial and industrial development through general plan revisions, zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance; - o in job-poor areas, increase the amount of planned future commercial and industrial development and/or reduce the amount of planned future residential development through general plan revisions and zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance, as applicable;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		- o impose developer fees on commercial and industrial projects in job-rich subregions to cover external costs associated with imbalanced development, and use fee revenues to build regional transportation infrastructure, mitigate air pollution effects of imbalanced growth, increase economic development programs in job-poor subareas, and facilitate housing development in job-rich subareas; - o impose developer fees on housing projects in housing-rich subregions to cover external costs associated with imbalanced development and use fee revenues as described above; - o revise and enforce air quality regulations (e.g., the South Coast Air Quality Management District New Source Review Rule and the Regional Air Standards Attainment Plan) to support J/H balance by restricting economic development in job-rich areas and favoring economic development in job-poor areas; - o monitor J/H balance performance as a condition of "Reasonable Further Progress" under the 1988 AQMP and restrict the flow of federal funds to those areas which fail to comply; - o encourage redevelopment projects in job-poor areas; - o reallocate property and sales tax revenues from job-rich to job-poor areas by developing a intra-regional tax-revenue sharing system similar to the one established in the Minneapolis-St. Paul, Minnesota region since 1975; - o implement growth management programs on a regionwide level by using local police powers to provide for more balanced growth (e.g., by phasing or structuring capital improvement programs so as to shape the pattern and timing of growth and by enacting ordinances requiring that growth be restricted as necessary to maintain minimum levels of service provided by local infrastructure systems); - o expand and improve infrastructure system (e.g., transportation, wastewater, schools, and recreation facilities), giving highest priority to projects that would promote job growth in job-poor areas or would promote housing growth in housing-poor areas, limiting funding for projects that would generate employment growth in job-rich areas or would generate housing growth in housing-rich areas by jointly developing and funding a regional capital improvement program or establishing intergovernmental agreements; - o locate new major job-inducing public facilities (e.g., universities, airports, and government service and trade centers) in job-poor areas;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
2-5 LAND USE AND CULTURAL RESOURCES	Urbanization of approximately 650,000 acres and conversion of agricultural and open space lands	- o encourage economic development in outlying job-poor areas by promoting the development of an extensive and active telecommunications network in the region that facilitates business location and development of those areas; - o target limited state and federal economic development funds (where possible), with the highest priority being given to projects that promote job growth in job-poor areas (targeting jobs that match the skill levels of the unemployed and under-employed in those areas and assist residents of job-poor areas in relocating to areas with expanding job opportunities; - o establish consistency with regional J/H balance objectives as a prerequisite or condition of incorporations approved by Local Agency Formation Commissions; and - o implement measures that would further housing development objectives of the RHNA, including the increased use of redevelopment revenues for development of affordable housing.
	Incorporations and annexations	None available. The following measures would partially reduce this impact, but not to a less-than-significant level. - o Refer to measures in this and other chapters: identified under the following impact categories: land use and cultural resources, ecological resources, and geology and hydrology. - o Local jurisdictions should limit <i>consider limiting</i> the extent of the adverse effects of urbanization of open, vacant, undisturbed, or agricultural lands by encouraging infill development at increased densities in areas that are already urbanized or are designated for urbanization rather than development of rural or outlying areas; implementing land use controls that discourage development of prime agricultural land; and encouraging the preservation and development of open space areas and parks within highly urbanized areas. Eligible voters, local jurisdictions, Local Agency Formation Commissions, and applicable regional and state agencies should authorize incorporations, annexations, and special district formations or changes that would result in the maximum feasible conservation of undeveloped land, the most efficient delivery of public services, and the least fiscal imbalance among all affected jurisdictions.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
	Possible damage, destruction, or removal of recorded and unrecorded cultural resources	Local jurisdictions should require that the following measures be undertaken, prior to approving development, to protect cultural resources: - o map areas of prime cultural resource significance; - o consult with the appropriate archeological or historical information center and clearinghouse (i.e., University of California at Los Angeles, University of California at Riverside, San Bernardino County Museum, or Imperial Valley College Museum) to identify known cultural resources and potential cultural resources that could be found on land proposed for development; and - o implement an archeological field survey if a development area is identified as "sensitive." If the field survey identifies significant cultural resources, preservation and mitigation measures should be recommended.
PUBLIC SERVICES		
Water Supply	Regional water supply shortfall of <i>approximately</i> 1.2 million acre-feet (MAF) (15 18.6 percent shortfall) in 2010, of which 0.7 0.8 MAF (21 18.6 percent shortfall) would occur in the coastal plain subregion and 0.5 0.4 MAF (11 7.7 percent shortfall) in the outlying subregion	The Metropolitan Water District of Southern California and other water providers in the region should increase dependable annual supplies at a regional level by 2010 to at least 8.0 <i>approximately 9.5</i> MAF and make the fullest use of existing resources by implementing the following measures as needed: - o increase State Water Project (SWP) yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements, offstream storage programs, Central Valley Project and other SWP programs; and implementation of water transfer agreements between agricultural and urban SWP contractors; - o obtain maximum use of Colorado River supplies; - o store up to 3.0 MAF of surplus water in groundwater basins; and - o make optimum use of existing resources and minimize adverse effects of supply shortfalls by local wastewater reclamation, groundwater protection, groundwater treatment, water conservation, surface water storage, and drought contingency planning projects.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Water Quality	Degradation of surface water, groundwater, and marine water quality	Local jurisdictions should link development phasing with phasing of new infrastructure, including adequate and effective drainage, wastewater, and waste disposal facilities; and Under direction of the U. S. Environmental Protection Agency, the State Water Resources Control Board, Regional Water Quality Control Boards, and local and regional agencies should administer National Pollutant Discharge Elimination System permits for point dischargers and implement comprehensive basin plans for ground-water protection and treatment; and Applicable jurisdictions and agencies should continue their influence and expand local coastal zone planning and management programs in conjunction with the State to prevent or reduce adverse effects on coastal water quality and to preserve or improve areas of special importance such as bays and estuaries; and Local jurisdictions should implement regional air quality mitigation measures to reduce or eliminate the potential adverse water quality effects of lead fallout and acid precipitation; and Local jurisdictions and water providers should mitigate groundwater quality problems by improving groundwater basin management as recommended in Regional Water Quality Control Board groundwater basin plans using various methods, including: conjunctive use of surface water, groundwater, and reusable wastewater; appropriate use of artificial recharge; and controls on development in recharge areas; and Local jurisdictions should mitigate adverse effects of water pollution from nonpoint and other sources by implementing measures in SCAG's Areawide Waste Treatment Management Plan, including: implementing plans for containing and cleaning hazardous substance spills; strengthening and enforcing local management controls on construction site erosion and sediment control; implementing best management practices to control water pollution from agricultural areas; implementing improved streets, litter, catchbasin, inlet basins, and storm drain cleaning programs; and implementing measures to limit runoff and minimize peak flows from developing areas.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Wastewater Treatment	Increased daily wastewater treatment demand to <i>approximately</i> 2,171 million gallons, exceeding available treatment capacity as follows: San Bernardino County - 51 percent Riverside County - 45 percent Los Angeles County - 19 percent Imperial County - 15 percent Orange County - 5 percent	The 1974 1979 Areawide Waste Treatment Management Plan (208) should be updated to be consistent with the GMP and AQMP; and To accommodate peak flows and to provide for a capacity reserve of approximately 10 percent, wastewater collection and treatment facilities should upgrade their facilities <i>may need to be upgraded</i> to the following 2010 capacity levels (percent over existing and funded capacity): - o Ventura County - 130 million gallons per day (MGD) (34) - o Los Angeles County - 1,850 MGD (65) - o Orange County - 510 MGD (47) - o Riverside County - 210 MGD (106) - o San Bernardino County - 300 MGD (108) - o Imperial County - 23 MGD (64)
Solid Waste	Depletion of existing landfill capacity by the following years: Ventura County - 1989 San Bernardino County - 1990 Orange County - 1995 Los Angeles County - 1996 Imperial County - 2008 Riverside County - 2008	A comprehensive-size regional solid waste management plan should be developed; and <i>implemented by counties within the region, and this plan should include waste reduction, reuse, and recycling programs.</i> The following counties, in their respective solid waste management plans, should require the following improvements, as identified by the California Waste Management Board: - o Ventura County - complete the major expansion of an existing landfill and develop a new landfill; - o Los Angeles County - expand existing landfills, develop new landfills, and implement resource recovery projects; - o Orange County - expand two existing landfills and develop a new landfill; - o Riverside County - expand one landfill and develop two new landfills; - o San Bernardino County - develop plans to expand one landfill; and - o Imperial County - develop plans to expand landfills.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Hazardous Waste	Generation of <i>approximately</i> 1.14-1.48 million tons of offsite hazardous waste in 2010	The Southern California Hazardous Waste Management Authority and each of its member counties should adopt and implement the 1989-Regional-Hazardous-Waste-Management-Plan hazardous waste management plans that include waste reduction programs; and
Schools	Demand for <i>approximately</i> 677 additional schools and 31,000 additional teachers	Hazardous waste management entities should increase the annual regional hazardous waste management capacity to 1.5 million tons by 2010 by establishing new disposal and treatment facilities. Local school districts should implement the following measures as needed: - o increase transportation of students from overcrowded schools to schools with surplus space; - o increase the capacity of all existing facilities through extended (e.g., year-round) schedules or other means; - o build at least <i>approximately</i> 677 new schools by 2010, including 582 elementary and junior high schools and 95 senior high schools; - o assess maximum allowable school impact fees as authorized by AB 2926 and use fee revenues to provide interim and permanent facilities; - o if fee revenues and state funding are not sufficient to acquire school sites and provide new facilities, establish alternative financing mechanisms, such as community facility districts, to generate needed revenues or negotiate agreements that provide for site dedication and/or school construction by private parties; - o hire additional qualified administrative, teaching, and support staff, including at least 31,000 new teachers; and - o provide educational programs that meet the educational needs of all students, particularly those whose English speaking ability is limited or who are otherwise disadvantaged.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Law Enforcement	Need for at least <i>approximately</i> 11,430 additional police officers and sheriffs and additional facilities (above 1984 levels)	Law enforcement entities should provide needed police personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed: - o implement programs to reduce the crime rate, including drug and gang prevention programs and education, job training, and community activities for youth and young adults; - o place greater reliance on developers to provide needed services and facilities; - o achieve better efficiency in the delivery of police protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; - o use new technologies and policies that increase system efficiencies and reduce demands; - o require that services be contracted to the private sector, such as private surveillance, in those instances where they can be provided more efficiently and at less cost; - o promote greater responsibility for nongovernmental provision of certain services or facilities at the neighborhood or homeowner association level; and - o require that development be phased according to the availability of adequate public services and facilities.
Fire Protection	Need for at least <i>approximately</i> 7,100-10,970 additional fire protection personnel and additional facilities (above 1977 staffing level)	Fire protection entities should provide needed fire personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed: - o reduce fire protection demands and costs by requiring adequate emergency access, applying land use restrictions in high-risk areas and performance standards on high-risk activities, and incorporating standard fire prevention features into new development (such as automatic sprinklers); - o implement fire safety education programs; - o provide specialized training for fire personnel as needed;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Health Care and Social Services	Increased need for health care services and facilities	- o achieve better efficiency in the delivery of fire protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; - o use new technologies and policies that increase system efficiencies and reduce demands; - o promote greater responsibility for nongovernmental provision of certain services or facilities at the neighborhood or homeowner association level; and - o require that development be phased according to the availability of adequate public services and facilities.
		Public and private health service providers should expand staff and facilities as needed. Facilities operating by 2010 should include at least 500 new skilled nursing facilities and additional hospitals, intermediate care facilities, and clinics. Providers should improve salaries and working conditions to attract and retain a sufficient number of skilled nurses and other medical personnel; and
		Public agencies and private organizations should expand subsidized health care services and provide more comprehensive health insurance coverage to those who cannot afford the costs of services, particularly to families with young children, the elderly, and those with acute health care needs; and
		Health service providers should develop and expand innovative, affordable, and cost-effective alternatives such as preventative care, adult day care, and home health care services.
Health Care and Social Services	Increased need for public assistance	Local, state and federal government agencies should increase the efficiency of the Food Stamps and MediCal programs to better serve those in need; and
		Public agencies and private organizations should reduce the level of future demand for public assistance by jointly developing and implementing innovative and cost-effective education, job training, job placement, child care, and family support programs.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Energy	Increased need for other social services	Employers in the region should participate directly or indirectly in providing or supporting child care services; and Service providers should develop and expand innovative, affordable, and cost-effective programs for delivering social services to the elderly, children, and the general population.
	Increased electricity and natural gas demand of 41,500 <i>approximately 60,740</i> Gigawatt-hours (Gwh) and 260 <i>486</i> billion cubic feet (Bcf) per year, respectively	Utilities, local jurisdictions, and residents should participate in implementation of the following measures, <i>as needed</i>: - o reduce overall future electricity demand in the region by 20 percent or 22,600 Gwh/yr projected 2010 regional electricity demand by approximately 30 percent through energy conservation; - o reduce overall future natural gas demand in the region by 15 percent or 111.62 Bcf/yr projected 2010 regional natural gas demand by approximately 29 percent through energy conservation; - o reduce projected 2010 regional residential, commercial, and industrial sector energy demand for electricity and natural gas as needed to accomplish the energy conservation objectives indicated above; - o reduce total annual residential sector demand by 25 percent, or 8,500 Gwh and 73.22 Bcf/yr, by applying California Title 24 building standards and state and federal appliance efficiency standards to all new construction, requiring retrofitting of existing buildings (e.g., weatherstripping and insulation) as feasible, shifting consumption to off-peak hours by developing, and implementing residential load management standards and rate adjustments; - o reduce total annual commercial sector demand by 30 percent, or 10,000 Gwh and 23.14 Bcf per year, by implementing Title 24 nonresidential building standards to all new construction, installing cost-effective conservation measures in existing commercial buildings, and developing and implementing lighting and commercial appliance efficiency standards; - o reduce total annual industrial sector demand by 5 percent or 2,600 Gwh and 15.22 Bcf per year by implementing increased motor and operation and control efficiency standards, installing cost-effective energy conservation equipment on industrial facilities (e.g., boilers), and increasing agricultural pumping efficiency;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		o provide incentives for cleaner and less energy-intensive industrial development and promote cogeneration and other practices to reduce manufacturing and industrial energy consumption; o increase the use of renewable and alternative energy sources (e.g., wind and geothermal) that generally are less capital-intensive and have shorter development lead times than conventional sources; and o apply measures recommended in the AQMP that would reduce overall in the generation of fossil fuel-based electricity within the air basin.
	Increased annual motor fuel demand of approximately 250-768 million gallons per year	Transportation agencies, local jurisdictions, employers, residents, and the automobile industry should participate in the implementation of the following measures, <i>as needed</i>: - o increase average vehicle fuel economy, particularly that of light-duty passenger vehicles, through technological change; - o increase the use of vehicles with greater fuel economy through increased fuel costs, taxes, or other economic incentives; - o increase the use of alternative or renewable energy sources (e.g., alcohol or other liquid fuels from biomass, hydrogen produced from solar or wind power, or the direct use of electricity generated by solar or wind power); - o plan future growth so as to minimize transportation energy use by promoting mixed-use development, public transit, nonmotorized travel, and beneficial social or technological developments (e.g., telecommunications); and - o reduce projected levels of future traffic congestion by implementing the preferred RMP strategy, as described in Chapter 7.

^a The CEQA finding in the Regional Mobility Plan EIR is "beneficial" rather than "less than significant after mitigation" since the Regional Mobility Plan EIR considers the Regional Mobility Plan as the proposed project, whereas the GMP EIR considers the Regional Mobility Plan as mitigation.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
TRANSPORTATION ^a	42 percent increase in total regional person-trips. Little change in the proportion of intracounty home-work trips to total home-work trips regionally or 64 percent increase in home-work trips from Riverside and San Bernardino Counties to Los Angeles County; 80 percent increase from Riverside and San Bernardino Counties to Orange County; 137 percent increase between Riverside and San Bernardino Counties 6 percent increase in average trip time and an 8 percent increase in average trip length 29 percent of the hours of travel would be spent traveling at less-than-free-flow speeds, compared to 10 percent in 1984 57 percent increase in regional vehicles miles traveled (VMT) with a 231 percent increase in VMT in Riverside and San Bernardino Counties 48 percent increase in miles of congestion during the a.m. and p.m. peak hours with 79 percent of the congestion in Los Angeles and Orange Counties Decrease in the transit mode split from 6.6 percent to 5.1 percent	None available to reduce the level of congestion and amount of delay to that experienced in 1984. The following mitigation measure would partially reduce these impacts, but not to a less than significant level: o Implement the Regional Mobility Plan preferred strategy within counties which calls for: - o facility development with 875 1,857 lane-miles of new roadway construction, 983 1,251 lane-miles of new high occupancy vehicle (HOV) capacity, 397 miles of new rapid-transit systems, and 112 new park-and-ride lots; feeder and local circulation transit development to support new and expanded line have transit in identified corridors connecting all activity centers in the metropolitan portion of the region; - o implementation of jobs-housing balance policies to shift 9 percent of new jobs to job-poor areas and 4.5 percent of new housing to housing-poor areas; - o demand management through the South Coast Air Quality Management District's Regulation XV, modified work weeks, employment center carpool goals, increased transit work trips, and extended peak periods; and - o system management of the existing and proposed roadway system through programs such as "SMART Freeway" technology; CALLBOX service authorities; and expansion of model separation programs, ramp metering, HOV ramp-meter-bypass installations, synchronized signals, and pavement management programs.

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
AIR QUALITY ^b	Exceedance of Draft 1988 Air Quality Management Plan (AQMP) target emissions levels (amount of emissions that could be produced in the South Coast Air Basin [SCAB] without violating federal and state air quality standards) as identified by the South Coast Air Management District (1988d). Target levels would be exceeded by the following amounts: - o reactive organic gases (ROG): 400-500 percent, - o carbon monoxide (CO): 20-25 percent, - o nitrogen oxide; (NOx): 250-350 percent, - o sulfur oxides (SOx): 100-300 percent, and - o inhalable particulate matter: 60-80 percent. Exceedance of the 1982 Air Quality Management Plan (AQMP) 2000 emissions estimates, which assume implementation of recommended control measures, by the following amounts: - o ROG: 75 percent, - o CO: 150-175 percent, - o NOx: 75-100 percent, - o SOx: up to 100 percent, and - o inhalable particulate matter: 50-75 percent.	None available for all-pollutants ROG and NOx if the technological breakthroughs associated with the AQMP's Tier III control measures do not become a reality. The following measures would partially reduce this impact, but not to less than significant for all-pollutants: - o Implement the transportation measures (Strategy 3) <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and - o Implement the feasible stationary, area, and mobile source control measures identified in the AQMP. Implementation of these measures may reduce CO, SOx, and inhalable particulate matter emissions at or below target levels. <i>For CO, SOx, and inhalable particulate matter, the following measures would reduce impacts to less than significant:</i> - o Implement the <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and - o Implement the feasible stationary, area, and mobile source control measures identified in the AQMP. None available for all-pollutants CO. The following measures would partially reduce this impact, but not to less than significant for all-pollutants: - o Implement the transportation measures (Strategy 3) <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7, and - o Implement the feasible stationary, area, and mobile source control measures identified in the AQMP. For implementation of these measures may reduce ROG, NOx, inhalable particulate matter, and SOx emissions, at or below the 1982 AQMP levels, the following measures would reduce impacts to less than significant: - o Implement the <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and - o Implement the feasible stationary, area, and mobile source control measures identified in the AQMP.

^b The CEQA finding in the Regional Mobility Plan EIR is "beneficial" rather than "less than significant after mitigation" since the Regional Mobility Plan EIR considers the Regional Mobility Plan as the proposed project, whereas the GMP EIR considers the Regional Mobility Plan as mitigation.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
NOISE	Exceedance of normally acceptable noise levels.	None available at some locations. The following mitigation measure would reduce this impact to a less-than-significant level at some locations: o Local and state jurisdictions should require needed noise abatement measures (such as construction of noise barriers and reduction of interior noise levels through building and site design features) to attain noise levels compatible with affected land uses; such measures should be designed based on an acoustical analysis by a qualified acoustical engineer.
ECOLOGICAL RESOURCES	Habitat loss from encroaching development	Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: - o conduct detailed inventories of biological resources that need protection to preserve natural diversity at the local and regional level; - o preserve unique natural areas; - o preserve prime agricultural lands, especially where such lands are connected to lands permanently set aside as conservation or open space lands; - o avoid significant habitats as a prerequisite for future development plans; - o improve the identification and implementation of mitigation measures for potentially impacted biological resources at the local level; and - o develop funding mechanisms to purchase and dedicate important biological resource lands as reserves and preserves. SCAG should develop <i>consider developing</i> a comprehensive regional plan to protect biological resources.
	Fragmentation of remaining habitats	Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: - o establish buffers where wildlands meet new development to form a transition area and provide some space between development and wildlands that need protection; - o establish corridors between remnant habitat areas or between remnants and large wildland parcels in general and specific plans and in local, subregional, and regional conservation and open space planning; and

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Loss of riverine, riparian, and wetland habitats		- o identify particular areas where fragmentation may be a problem and develop measures to provide or maintain corridors, translocate individual animals if numbers become too low, and provide buffers. Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: - o use open space and conservation designation to protect riverine, riparian, and freshwater wetlands from development; - o promote naturalized flood control channels such as those promoted under the California Department of Water Resources Urban Creeks Program; - o support the design of flood control channels to accommodate flood flows in vegetated channels; - o require all projects that impact riverine, riparian, and wetlands resources to mitigate in-kind for any habitat impacts; - o support local, subregional, and regional mitigation banks that create or restore degraded riparian or wetland habitats; and - o facilitate coordination with U. S. Army Corps of Engineers on Section 10/404 permits (dredged/discharge fill material) and with the California Department of Fish and Game on Fish and Game Code Section 1601-3 agreements (channel modifications) to afford maximum habitat protection and coordinated creation and restoration planning.
Loss of individuals and habitat for rare, threatened, and endangered species		Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: - o require surveys as part of the planning process for all species that are candidate, proposed, or listed under the federal and state Endangered Species Acts; - o require adequate mitigation for any development that would have an adverse impact on listed species; - o encourage mitigation activities to be monitored and ensure that provisions be made in entitlements for successful implementation; - o encourage enhancement of listed species habitats through conservation and open space plans to protect species whose numbers are becoming so low they soon will be listed;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		- o recognize the development of Habitat Conservation Plans (HCP) (Section 10 of the federal Endangered Species Act) or their equivalent as special land use plans that incorporate large areas and many ownerships in a cooperative plan to support a listed species; and - o encourage the development of public and private mitigation banks that incorporate large areas where habitats can be created or enhanced to compensate for habitat lost to development.
	Loss of habitats from wildlands fire and fire suppression	Local jurisdictions in the SCAG region should support fire hazard mitigation planning that seeks to keep fuel loads suppressed without removing all the vegetation.
	Recreational impacts in desert, mountains, and coastal areas	Local jurisdictions in the SCAG region should adopt <i>consider adopting</i> policies with the following objectives: - o coordinate local park planning with the appropriate state departments and federal agencies; - o support adequate funding for law enforcement personnel to protect reserve, preserves, parks, and other public lands; - o support a wide range of facilities from intensive activity park sites to wilderness areas; and - o use habitat and species surveys discussed earlier under mitigation for potential habitat and listed species losses to identify areas to be avoided for recreational activities and facilities.
	Reduced tree vigor and increased tree mortality from air pollution	Local jurisdiction in the SCAG region should adopt <i>consider adopting</i> policies with the following objectives: - o support continued research to find improved strains of coniferous species that are more tolerant of pollutants; and - o implement the air pollution mitigation measures identified by the <i>Draft</i> 1988 AQMP.
	Effects of pollutants on near shore ocean waters	Refer to the water quality measures for coastal areas identified in Chapter 6.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
GEOLOGY AND HYDROLOGY		
Seismicity	Increased exposure to seismic hazards	None available. The following measures would partially reduce this impact, but not to less than significant: - o Local jurisdictions within the SCAG region should continue to: - implement the Alquist-Priolo Act by identifying areas of severe seismic hazard and avoid them as development areas; - develop disaster relief programs to serve the entire SCAG region and improve interjurisdictional coordination; - institute programs to identify those structures throughout the SCAG region that are especially vulnerable to earthquakes and endeavor to repair or replace dangerously vulnerable building; and - comply strictly with ordinances and regulations governing construction of homes, buildings, and facilities in seismically active areas.
Aggregate Resources	Depletion of Portland Cement Concrete (PCC) aggregate resources would increase construction costs	Local jurisdictions in the SCAG region should continue to comply with the Surface Mining and Reclamation Act, which requires them to incorporate mineral resource management policies into their general plans, such as the implementation of land use planning strategies that avoid future development on lands containing significant PCC grade aggregate resources and that site compatible uses adjacent to aggregate resource sites and along mine access routes.
Hydrology	Potential aggravation of landslide and erosion conditions in hilly and mountainous areas	Local jurisdictions in the SCAG region, in their respective general plans, should continue to require the following: - o inspection of slopes above and below proposed developments by a geotechnical engineer prior to grading and following fine grading of construction sites and adherence to recommendations for the elimination of hazardous soil and slope conditions; - o implementation of fire prevention measures; - o revegetation following fire damage to reduce the amount of rock, soil, and other debris that would flow downslope during rainfall events by allowing vegetation to anchor soils and detain runoff; and

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Potential exposure of new development in desert areas to flash floods		- o installation and maintenance of sedimentation basins in appropriate locations along drainages to capture sediment, mudflows, and landslides before they reach homes and other flood damageable property. Local jurisdictions in the SCAG region, in their respective general plans, should continue to: - o identify flash flood wash areas and other geologic formations indicating past flooding activity, as determined by a hydrologist or hydraulic engineer experienced with flash flood conditions; - o require avoidance of future development in flash flood susceptible areas; - o require that information concerning flood hazard potential be posted at all access points to parks and recreation areas, in the event of rainfall; and - o require installation of adequate flood control structures to protect existing and future development from flash flood hazards and design of flood control structures by a registered professional engineer experienced in the design of flood control and flood protection structures for flash flood runoff events.

CHAPTER 3. COMMENTS AND RESPONSES TO COMMENTS

March 21, 1977

Mr. Steve Plesner, Generalist Director
California Department of Transportation
201 J. Street, Suite 1111
Sacramento, CA 95833

Dear Mr. Plesner:

Thank you for the opportunity to review and comment on the proposed
California Department of Transportation (Caltrans) Environmental Impact Report (EIR) for the
City of Irvine. The City of Irvine is concerned that the proposed project will
adversely affect the city's growth and development. The City of Irvine is
concerned that the proposed project will result in the loss of open space and
agricultural land. The City of Irvine is concerned that the proposed project will
result in the loss of the city's natural resources.

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natural resources. The City of Irvine is concerned that the proposed project will
result in the loss of the city's natural resources.

Sincerely,

[Signature]
City Manager

cc: [unclear]

cc: [unclear]
[unclear]
[unclear]
[unclear]

[unclear]



Community Development Department

City of Irvine, 17200 Jamboree Road, P.O. Box 19575, Irvine, California 92713 (714) 660-3600

October 31, 1988

Mr. Mark Pisano, Executive Director
Southern California Association of Governments
600 S. Commonwealth
Suite 1000
Los Angeles, CA 90005

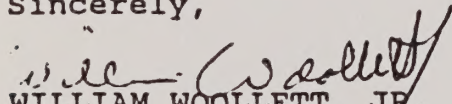
Dear Mr. Pisano:

Thank you for the opportunity to review and comment on the Southern California Association of Governments' (SCAG) draft plan and draft environmental impact report (DEIR) on Regional Growth Management. The City of Irvine is concerned that the comment period is not sufficient and requests SCAG to grant an extension for comments to February 1, 1989.

The City is concerned that the Growth Management Plan will have severe impacts on the future of the region. It also will impact other regional plans, such as the Regional Mobility Plan and Air Quality Management Plan, which are also currently in draft form. The complex interrelationship of these plans can not be overstated. It is important that they be evaluated together and in a thorough manner which dictates more time than the allotted period allows.

The City of Irvine, like SCAG, is concerned about the manner in which the future growth of the region is controlled. Your cooperation is appreciated and the City, again, thanks you for the opportunity to comment. If you have any questions, please call Eve Somjen, Acting Principal Planner, at (714) 660-3647.

Sincerely,


WILLIAM WOOLLETT, JR.
City Manager

WW/SR/kh

cc: Don Griffen, President, SCAG
Viviane Doche-Boubs, SCAG
Paul Hatanaka, SCAG
Delaine Winkler, SCAG

disk:LPisano

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
COMMUNITY DEVELOPMENT DEPARTMENT

1. On October 19, 1988, SCAG received approval from the State Clearinghouse for a 30-day DEIR review period as allowed by CEQA.

Integral relationships exist between the goals, policies, and action items of the Draft 1988 Air Quality Management Plan (AQMP), the Regional Mobility Plan (RMP), and the GMP. Because the GMP and RMP are important components of the AQMP, SCAG should not adopt the GMP and RMP after the adoption date of the AQMP.

All three plans and EIRs have undergone review at several public hearings and public workshops throughout the planning and environmental analyses process.

On November 3, 1988, SCAG's Executive Committee requested the South Coast Air Quality Management District (SCAQMD) Board to extend the AQMP and EIR process until February, 1989. The board denied the request because of the importance of adopting the AQMP prior to the promulgation of a Federal Implementation Plan by the U. S. Environmental Protection Agency (EPA).

Once the AQMP is adopted, SCAG and the SCAQMD will establish task forces to discuss several unresolved issues, including growth management, socio-economic impacts, alternative fuels, monitoring implementation, and regional mobility. This process will lead to issue-specific recommendations to SCAG and the SCAQMD at the end of a 9- to 12-month period. In turn, those recommendations could necessitate additional project-specific environmental documents and amendments to the plans. Therefore, it is important to recognize that the AQMP, GMP, and RMP are all ongoing planning programs.

Because of the reasons stated above, SCAG cannot extend the comment periods for the GMP, the RMP, and the related EIRs.

Memorandum

To : Dr. Gordon F. Snow
Assistant Secretary for Resources

Date : NOV 03 1988

Mr. Paul Hatanaka
Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Subject: Draft Environmental
Impact Report for
SCAG's 1988 Regional
Growth Management
Plan,
SCH# 88062924

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed Southern California Association of Governments' (SCAG) 1988 Regional Growth Management Plan. We offer the following comments.

The Draft Environmental Impact Report (EIR) makes reference to our Special Publication 60, "Earthquake Planning scenario for a magnitude 8.3 earthquake on the San Andreas fault in southern California". Although you may be aware of it, we have recently published a "Planning Scenario for a Major Earthquake on the Newport-Inglewood Fault Zone", Special Publication 99. We recommend use of this report in the preparation of the Plan's Earthquake Contingency and the Final EIR.

If you have any questions regarding these comments, please contact Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-2562.

Dennis J. O'Bryant

Dennis J. O'Bryant
Environmental Program Coordinator

DJO:2M:it
0350q/0011q

cc: Zoe McCrea, Division of Mines and Geology
Richard B. Saul, Division of Mines and Geology

RESPONSES TO THE COMMENTS OF THE CALIFORNIA
DEPARTMENT OF CONSERVATION

2. Page 11-2 of the DEIR describes scenarios for movement along the Newport-Inglewood fault zone based on an article by the U. S. Geological Survey. Reference to California Division of Mines and Geology Special Publication 99 is hereby incorporated into the EIR.



MLT009

CITY COUNCIL OF THE CITY OF LOS ANGELES

OFFICE OF THE PRESIDENT

JOHN FERRARO

COUNCILMAN 4TH DISTRICT

M-30, CITY HALL
LOS ANGELES, CA 90012
(213) 485-3337

November 10, 1988

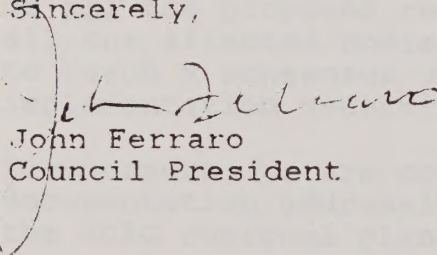
Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90005

Dear Mr. Pisano:

We have recently received the Southern California Association of Governments' Draft Growth Management Plan and Environmental Impact Report. The City feels that this report could have a major impact on the direction of future growth in Southern California and consequently, welcome the opportunity to comment on the report. However, because of the complexity of this subject and the great amount of data contained in the Plan, we would request that the comment period be extended for an additional two weeks from the November 18 deadline to provide adequate time to digest and respond to the report.

Thank you for your consideration of this request. I can assure you that you will hear from us in the near future.

Sincerely,


John Ferraro
Council President

NOV 15 1988

SOUTHERN CALIFORNIA ASS'N.
OF GOVERNMENTS

RESPONSES TO THE COMMENTS OF THE CITY COUNCIL
OF THE CITY OF LOS ANGELES

3. See Response 1.



City of Irvine, 17200 Jamboree Road, P.O. Box 19575, Irvine, California 92713 (714) 660-6600

November 14, 1988

Ms. Vivian Doche-Boulos
Southern California Association of Governments
600 S. Commonwealth Ave., Suite 1000
Los Angeles, CA 90005

SUBJECT: DRAFT 1988 GROWTH MANAGEMENT PLAN AND ENVIRONMENTAL
IMPACT REPORT

Dear Ms. Doche-Boulos:

Thank you for providing the opportunity to review the Draft 1988 Growth Management Plan and the corresponding Draft Environmental Impact Report. The City of Irvine has three major concerns about the draft plan. In addition, specific comments on the documents and their appendices are attached.

First, we remain concerned about the lack of an organized effort by the Southern California Association of Governments (SCAG) and the South Coast Air Quality Management District (SCAQMD) to include the affected public agencies and members of the private sector in the policy development. The successful implementation of all the proposed regional plans requires the cooperation of all the affected bodies. We suggest that a process be developed to reach a consensus on control measures and to establish implementation mechanisms prior to adoption of the plans.

Furthermore, we are concerned that there is no detailed documentation addressing the complex interrelationship of all the SCAG regional plans with the SCAQMD's Air Quality Management Plan. References to the other documents are made in each plan, and it is clear that for complete attainment of the goals and objectives, each of the component plans must be adopted, but an explanation of the interrelationships and dependencies is a necessity for a complete understanding. Specifically, the discussion should detail the responsibilities and authority to guarantee the successful implementation of the plans.

4

Finally, the timing of all the plans remains a concern to the City. It has been difficult to acquire all of the related plans. The Growth Management Plan has only recently become available. With respect to the extensive documentation of these plans and the magnitude of their impacts, the review periods that have been provided are clearly insufficient. We again request that SCAG consider extending the deadline for comments until February 1, 1989.

The City of Irvine is concerned about the issues addressed by the Growth Management Plan, such as air quality and traffic congestion, and would like to lend its support to any proposals which can successfully make a positive impact on these issues.

Thank you again for this opportunity to comment and for your cooperation. If you have any questions, please contact Eve Somjen, Acting Principal Planner, at (714) 660-3647.

Sincerely,



WILLIAM WOOLLETT, JR.

Acting Director of Community Development

cc: Eve Somjen, Acting Principal Planner
Gail Shiomoto-Lohr, Principal Transportation Analyst
Diana Blaisure, Associate Planner

WW/SR:camG/sr-vivian

CITY OF IRVINE
COMMENTS ON THE 1988 DRAFT SCAG GROWTH MANAGEMENT PLAN
AND DRAFT ENVIRONMENTAL IMPACT REPORT

- p. I-1: The discussion on the purposes of the GMP should include discussion on how the plan is tied into the AQMP. Also, why and how are the year 2010 projections for the GMP being folded into the AQMP, which has a horizon year of 2007.
- p. I-3: The discussion refers to growth management systems in place. Examples and explanations of these systems and how the Growth Management Plan is a "restructuring" of these systems would be useful.
- p. II-5: Figure II-3 does not demonstrate the region's housing totals. Should the reference have been to Figure II-4?
- p. II-5: Are the housing unit totals in Figure II-4 total units or new units?
- p. II-5: Perhaps a line graph demonstrating total housing trends and projections would be useful.
- p. II-6: In discussing the expected increase in personal income over the next two decades, were inflation trends considered? Perhaps focusing on disposable income would be more appropriate.
- p. II-6: What assumptions suggest Hispanic household size will decrease?
- p. II-6: What are the distinctions between low, moderate, and high with respect to wages and job skills? Can examples of each be provided?
- p. II-8&9: For comparison purposes, the growth rates and other information should be presented similarly for each county.
- p. III-3: In discussing the necessary number of lane miles, is the total 4,181 to 6,000 lane-miles in addition to existing lane miles or does it include the existing lanes?
- p. III-3: What is a modest increase in transit ridership?
- p. IV-2: Provide additional discussion on the analysis that was conducted to determine that traffic congestion is related to unbalanced distribution of jobs and housing. How much of the congestion is attributable to the imbalance?

- p. IV-5: To encourage the balance of type of job with the price of housing may segregate some areas by economic status, a policy SCAG wants to avoid.
- p. VII-1: The stated intent of GMA-4 Modified J/H Balance Forecast is to adjust the most recent trend projection data, and then to adjust the housing and employment to achieve the levels of mobility and air quality that are comparable to GMA-2. Are the GMA-2 air quality levels the same as those targeted for in the AQMP?
- p. VII-2: Are the regional impacts of GMA-4 Modified realistic, considering that indicators such as the match between the price of housing and the household income of the employees in the area could not be included in the measurement of jobs and housing balance?
- p. VIII-1: Much of the implementation process assumes voluntary participation of local jurisdictions. What will assure this will happen and what actions will SCAG take if local jurisdictions do not comply?
- p. VIII-1: Have jurisdictions with jobs/housing balance objectives adopted them to reduce commute times and improve air quality or for more local reasons?
- p. VIII-2: Since implementation of the GMP is envisioned to be voluntary, what actions will be taken to ensure that all local jurisdictions will be represented on the Subregional Entities? These groups, with SCAG's assistance, will be developing the jobs/housing five-year targets for each jurisdiction; thus it seems imperative that each local entity be represented.
- p. VIII-3: The timeline for adoption of a General Plan Amendment may be unrealistic.
- p. VIII-4: What are "balance-promoting infrastructure improvements?" Provide some examples so that the reader can fully understand this concept.
- p. VIII-4: For projects that exceed either the housing or employment targets, one identified option is to require the developer to provide housing or job opportunities in another area within the sub-region. How would this strategy be monitored to ensure that certain areas are not always the target of the mitigation measures?

p. A1-1: Exactions of regional scale, as discussed, will only be beneficial if they are adopted on a regional scale. This requires the cooperation of all jurisdictions.

p. A1-2: The local police powers measures strategy does not address the issue of housing cost. Although local jurisdictions may be able to promote housing construction in housing-poor/job-rich areas, discussion is absent regarding how to handle the cost issue.

When and how will it be decided which strategies and techniques (as outlined in Appendices 1 and 2) will be encouraged by SCAG? Are all of them options that should be considered as part of the GMP?

Sedway Cooke Associates' discussion on conflict resolution procedure between local jurisdictions, counties, and SCAG is much appreciated.

p. A1-4: Who will establish regional priorities for building the infrastructure necessary to support the projected job growth?

Also, are local jurisdictions being asked to implement strategy 4b? The GMP states that funds for projects are to be made available only to a level that would foster the amount of employment growth shown in regional targets for job-rich areas.

A number of the proposed Infrastructure Funding strategies entail setting regional priorities for various improvement programs and projects. What process or system is envisioned by SCAG that will allow all of the affected agencies to provide input as well as a system that will resolve conflicting priorities?

p. A1-5: Strategy 5, the incentive measure of eliminating or reducing developer fees, contradicts the exaction strategy discussed on page A1-1. In what development situations would local jurisdictions provide incentives and in what situations would they charge fees?

p. A2-3: Sedway Cooke's report suggests as a planning strategy adherence to the Regional Growth Management Plan. If this is to be, the GMP should clearly discuss requirements and actions necessary of local governments.

7
Cont

- p. A2-5: Would not formal project review by a regional authority slow the processing of some development projects which counteracts streamlining review as suggested in technique #6 in Appendix 1?
- p. A2-7: Although more dense development patterns to increase job and housing proximity may help to keep trips at a local level rather than on the regional system, it may also work to exacerbate local traffic congestion.
- p. A2-8: Currently, affordable housing costs to potential residents are based on the county median. Will a regional median be calculated and used rather than a different county median?
- p. A2-24: The Growth Management Quota System -- which would restrict residential growth--seems as if it would increase vehicle miles travelled unless all jurisdictions simultaneously implemented and enforced this policy. If not, affordable housing could be built in less developed areas where less expensive land is available.

Since so many of the job/housing balance strategies require cooperation among most levels of government, but are also voluntary, how will consistency throughout the region be established and maintained?

In the DEIR on pp. 7-6 and 7-7, no LA to Orange intercounty home-work trips appear. Is this amount insignificant? Are none projected for 2010?

The City has also submitted comments to SCAG on the Regional Mobility Plan. Our concerns regarding the region's future transportation system and funding and SCAG's preferred RMP strategy apply to the GMP DEIR as well.

camG/sr-gmp

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
COMMUNITY DEVELOPMENT DEPARTMENT

4. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
5. See Response 1.
6. Comment noted.
7. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
8. Los Angeles to Orange intercounty home-work trips are as follows:

1984		155,000
2010	proposed project	184,068
	GMA-1	231,018
	GMA-2	203,158
	GMA-3	182,972
	GMA-4	189,812
9. Refer to the RMP/RMP FEIR for a discussion of this issue.



NOV 13 1988

The Metropolitan Water District of Southern California

Office of the General Manager

NOV 14 1988

Mr. Mark Pisano, Executive Director
Southern California Association
of Governments
Suite 1000
600 South Commonwealth Avenue
Los Angeles, California 90005

Dear Mr. Pisano:

Growth Management Plan

We have reviewed your Draft Environmental Impact Report (DEIR) for the project identified above. The comments herein represent our response to your proposed action as a Responsible Agency under the California Environmental Quality Act (CEQA).

To present a more accurate description of the water supply and quality issues affecting the Southern California Association of Governments (SCAG) region, we are suggesting a number of revisions to your DEIR. For your convenience, we have included our detailed comments on the attached pages of the DEIR.

In general, our comments address inaccuracies related to State Water Project and Colorado River supplies, alternatives to provide additional supplies and more efficient use of existing water resources, projected regional shortfalls, and how Metropolitan and other agencies should meet projected demand (mitigation measures).

We appreciate the opportunity to review your DEIR. If we can be of further assistance, please contact me at (213) 250-6437.

Very truly yours,

Roberta L. Soltz, Ph.D.
Environmental Section Head

RLS/gg

Attachment

CHAPTER 6. PUBLIC SERVICES

WATER SUPPLY AND QUALITY

Setting

Existing Water Sources and Uses

Local Supplies. Local surface water sources and groundwater basins provide about one-third of the region's water supply. The largest surface water sources in the region are the Colorado River and the Santa Ana and Santa Clara River systems. Major groundwater basins in the region include the Central, Raymond, San Fernando, and San Gabriel Basins (Los Angeles County); the Upper Santa Ana Valley Basin system (San Bernardino and Riverside Counties); the Coastal Plain Basin (Orange County); the Coachella Valley Basin (Riverside County); and the Oxnard Plain Basin (Ventura County).

Local water resources are fully developed and are expected to remain relatively stable in the future on a regionwide basis. However, local water supplies may decline in certain localized areas and increase in others. Several groundwater basins in the region are threatened by overdrafting, increasing levels of salinity, and contamination by toxics or other pollutants. Local supplies may also be reduced by conversion of agricultural land to urban development, thereby reducing the land surface available for groundwater recharge. The future use of groundwater could also be limited by water quality, since levels of salinity in sources currently used for irrigation could be unacceptably high for domestic use, requiring demineralization prior to such use.

Imported Supplies. Approximately 64 percent of the SCAG region's water supply is imported from other areas of the state. Several major conveyance systems bring water to the urbanized portion of the region from northern California, via the State Water Project (SWP); the Sierra Nevada, via the Los Angeles Aqueducts; and the Colorado River, via the Colorado River Aqueduct. The All-American/Coachella Canals deliver agricultural irrigation water from the Colorado River to the Coachella and Imperial Valleys.

The continued availability of water ^{slightly over time} from these sources is uncertain at current levels. The firm or dependable yield of the SWP system, based on existing facilities, is expected to decrease ~~by 2000~~ as water use in areas of origin in northern California increases, ^{and} Central Valley Project (CVP) contractual obligations increase, ^{and} ~~users with prior rights to northern California water supplies exercise those rights (Southern California Association of Governments 1987).~~

dependable supply

The amount of water that California imports from the Colorado River (including surplus flows) is expected to decline substantially in the near future when the Central Arizona Project (CAP) becomes fully operational by the early 1990s. The Metropolitan Water District of Southern California's (MWD's) annual apportionment of Colorado River water would be reduced by approximately 620,000 million acre-feet (MAF) (55 percent) from 1.20 MAF to 0.55 MAF as a result of the CAP and increased water use by upper Colorado River basin states. Annual apportionments to the Imperial Irrigation District, Coachella Valley Water District, and Palos Verdes Irrigation District, which currently total 300,000 AF, would be eliminated by operation of the CAP. (California Department of Water Resources 1987)

[Insert, next page]

State Water Project. If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. Of the 1.86 MAF in maximum SWP entitlements held by contractors in the MWD service area for 1988, a total of 1.08 MAF in approved orders were processed (58 percent of maximum entitlements) due to facilities constraints. Maximum entitlements to these contractors are scheduled to increase to 2.0115 MAF per year in 1990 (Horne pers. comm.).

Efforts to increase dependable yields through the SWP have included a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation, completion of additional pumping capacity in the Delta, development of additional offstream storage facilities, and water transfers from agricultural to urban SWP contractors. Statewide estimates indicate that annual net use of SWP supplies will increase by 800,000 AF (33 percent) from 1985 to 2010, increasing from 2.4 MAF to 3.2 MAF. The SWP would not be able to meet this increased demand in most years with existing facilities, but could do so in approximately 4 of every 5 years, assuming that existing facilities are expanded as planned (California Department of Water Resources 1987).

Los Angeles Aqueducts. The Los Angeles Aqueducts currently provide nearly 470,000 AF per year or 80 percent of the water supply for the City of Los Angeles. However, pending or future litigation and legislation aimed at reducing both the diversion of water from the Mono Basin and groundwater pumping in the Owens Valley could lessen this yield substantially.

Colorado River. Because of an increase in the use of entitlements by users in Arizona, the dependable supply of Colorado River water allocated to the MWD has been reduced from 1.20 MAF to 0.55 MAF per year, and is conservatively projected at 0.47 MAF per year by MWD staff (Chan pers. comm.). The Imperial Irrigation District, Palos Verdes Irrigation District, and Coachella Valley Water District hold priority to the first 3.85 MAF of California's 4.4 MAF apportionment of Colorado River water. Strategies for transferring the use of these supplies from agricultural to urban uses are currently being investigated by the MWD.

after deductions for rights held by others and system losses.

Based on historic diversion of Colorado River water Coachella Valley Water District loss in dependable supplies could be as much as 238,000 AF of 3.6 MAF in 2010

more efficient

If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. The total maximum SWP entitlements held by contractors south of the Tehachapis for 1988 was 2.213 MAF of which 1.86 was for MWD. In 1988, all contractors south of the Tehachapis requested 1.188 MAF; MWD's request was 1.03 MAF. All requests were approved. Until the East Branch of the California Aqueduct is enlarged in 1992, MWD can only import about 1.4 MAF from the SWP; however, MWD's maximum annual entitlement will increase to 2.0115 MAF in 1990.

Subregional Assessments

Water demand and supply projections shown in Table 6-1 consider two major subregions. The largely urbanized coastal plain subregion includes all of Orange County, most of Los Angeles County, large portions of Ventura County and Riverside County, and a smaller portion of San Bernardino County. The outlying subregion includes all of Imperial County, northern Ventura County, northern Los Angeles County, eastern Riverside County, and the remainder of San Bernardino County. Subregions are shown in Figure 6-1.

9 Coastal Plain Subregion. The 1984 population of the coastal plain subregion was approximately 11.08 million (89 percent of the regional total). Approximately 2.84 MAF (2,536 MGD) of water was utilized in this subregion in 1984 by urban and agricultural uses, which represented 89 and 11 percent of regional water demand, respectively. About one-third of the water used in that year was derived from groundwater supplies and local sources; the remainder was imported from the Colorado River, the Sacramento Delta (through the SWP) and the Owens/Mono basins (through the Los Angeles Aqueducts).

Northern California

and surface (thru the Colorado River Aqueduct)

If untreated, water degraded by increased levels of salts, nitrates, and other pollutants could render certain groundwater in basins in this subregion unsuitable for domestic consumption.

Outlying Subregion. The 1984 population of the outlying subregion was approximately 1.37 million (11 percent of the regional total). Most areas of the outlying subregion are heavily dependent on local surface and groundwater resources as major sources of supply for both domestic and agricultural uses. Supplemental supplies are also currently available in some areas through SWP contractors. The largest source of supply in this subregion is the Colorado River. The Imperial Irrigation District, Coachella Valley Water District, and Palos Verdes Irrigation District hold priority to 3.85 MAF annually of Colorado River Water.

Past population growth and agricultural development have resulted in groundwater pumping that has greatly exceeded safe yield levels. Many major groundwater supply sources in this subregion are overdrafted, including the Oxnard Plain Basin (Ventura County), Antelope Valley Basin (north Los Angeles County), Mojave Basin (San Bernardino County), and the Coachella Valley Basin (Riverside County). As in the coastal plain subregion, water degraded by increased levels of salts, nitrates, and other pollutants could render certain groundwater in basins in this subregion unsuitable for domestic consumption if untreated.

Water Service Providers

Metropolitan Water District. The primary supplier of water to the region is the MWD. The MWD covers 5,130 square miles of the coastal plain in southern California, including 240 cities and unincorporated communities in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. The MWD service area excludes certain portions of the SCAG region, i.e. Imperial County and most of San Bernardino County, and is

Table 6-1. Regional and Subregional Water Supply and Demand Projections in 1984 and Under the Proposed Project and Alternatives (2010)

	REGIONAL TOTAL (1984)	REGIONAL TOTAL (2010)	PLAIN SUBREGION (2010)	OUTLYING SUBREGION (2010)
Dependable Supplies (MAF per year)	7.48	6.72	2.60	4.12
Demand (MAF per year)				
Urban	3.03	3.98	3.62 (3.07) ^e	0.91
Agriculture	4.02	3.94	0.74 (0.23) ^e	3.71
Total	7.06	7.92	3.30	4.62
Projected Surplus (Shortfall) (MAF per year)	0.42	(1.20)	(0.70)	(0.50)
Projected Surplus (Shortfall) as Percentage of Total Demand	5.95	(15.15)	(21.2)	(10.8)

Source: Southern California Association of Governments (1987)

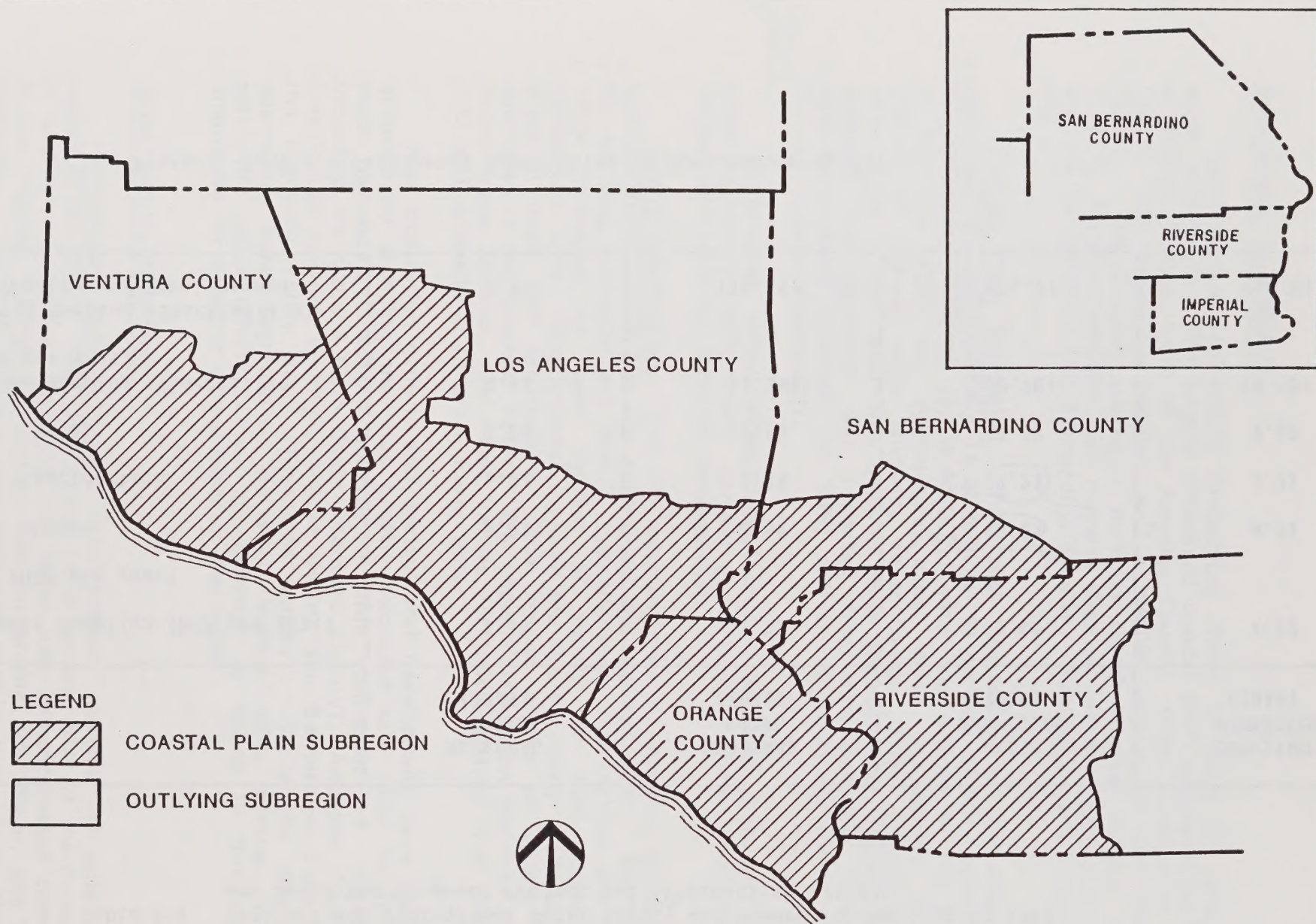


FIGURE 6-1. COASTAL PLAIN AND OUTLYING SUBREGIONS

generally contiguous with the coastal plain subregion as shown in Figure 6-1.

The population of the MWD service area has increased from 7.4 million in 1960 to more than ^{13.6} 14 million in 1986, which represents approximately half of the state's population (State Water Contractors 1987a, Southern California Association of Governments 1987). The MWD sells water to 27 local districts, including the Los Angeles Department of Water and Power, 13 other cities, 12 municipal water districts, and one county water authority.

The MWD ^{is dependable or firm supply is estimated to be} holds rights to approximately 3.37 MAF per year of dependable or firm supply, including 1.19 MAF from local sources, 1.14 MAF from the SWP, 0.47 MAF from the Colorado River, 0.42 MAF from the Los Angeles Aqueducts, and 0.15 from wastewater reuse (Chan pers. comm.). Firm or dependable yield is the annual supply expected to be available during periods of below-average precipitation, in accordance with a predetermined schedule or probability. Dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1.

*Note:
this value is for the entire region.
This value is misplaced

^{did use 7 year old data? memo appropriate} Los Angeles Department of Water and Power. The City of Los Angeles Department of Water and Power (LADWP) is the second largest importer of water to the urbanized portion of the SCAG region. Although it is within the MWD service area and a member of the MWD, nearly 82 percent of the city's water demand in (1980-81) was met by the LADWP by importing supplies through the Los Angeles Aqueducts from the Owens Valley and Mono Basin, 12 percent was derived from local groundwater sources, and only 6 percent was provided by the MWD (Southern California Association of Governments 1982). The amount of water imported to the City of Los Angeles by the LADWP could be substantially reduced, pending the outcome of present and future litigation as discussed above.

Other Providers. Other major water providers include the Imperial Irrigation District, the Coachella Valley Water District, and the Palos Verdes Irrigation District.

Water Resource Alternatives. The MWD ^{during wet periods} and other water providers are currently exploring various strategies for increasing water supplies and maximizing use of existing supplies. Imported supply options include storage of water from existing sources, ^{use or storage of surplus water from other states or agricultural agencies, and predelivery of exchange water to irrigation districts.} ^{using Colorado River water} ^{water agencies in Coachella Valley}

^{is considering storage} The MWD ^g has proposed storage of up to 3.0 MAF of surplus water in the Chino Basin (San Bernardino County), San Jacinto Basin (Riverside County), Main San Gabriel Basin (Los Angeles County), Raymond Basin (Los Angeles County), North Las Posas Basin (Ventura County), Coachella Valley Basin (Riverside County), and Arvin-Edison Basin (Kern County). The feasibility of this strategy, however, may be limited by the adverse effects of groundwater quality due to leaching of contaminants from the soil and disturbance of aquifers (Sienkiewich pers. comm.).

unused entitlements of Colorado River Water from other lower Colorado River basin states and

Reclaimed wastewater is the largest undeveloped local water resource available to offset future deficits in supply. Reclamation projects have been implemented in various areas within the region. The feasibility of increasing wastewater reclamation is limited by insufficient distribution capacity, cost, health concerns, and liability issues. The MWD provides financial support to local districts for wastewater reuse and groundwater treatment projects and is investigating methods of reducing and mitigating groundwater contamination (Sienkiewich pers. comm.).

Water Quality

The following analysis considers the quality of surface and groundwater sources that lie within the Santa Clara River Basin, Los Angeles River Basin, Santa Ana River Basin, and coastal and desert areas.

Santa Clara River Basin. The Santa Clara River Basin area is located in Ventura County and northern Los Angeles County and is drained by the Santa Clara River, which empties into the Pacific Ocean near Oxnard.

Surface water sources. Water from major reservoirs in the basin area is provided largely by the SWP and Los Angeles Aqueducts, and is generally of high quality. Tributary creeks generally possess good water quality except during low flows. Quality of the Santa Clara River is poorer and worsens in downstream sections when groundwaters rise, bringing high levels of total dissolved solids (TDS), irrigation return flows, and other contaminants.

Groundwater sources. Nine important groundwater basins are located in this area, with the Oxnard Plain Basin being the most important. Groundwater quality in the Oxnard Plain Basin has been deteriorating because of deep percolation of sewage, irrigation return flows, industrial wastes, and saltwater intrusion. Groundwater quality is generally good in the upper Santa Clara River Basin (Los Angeles County) but worsens near the Los Angeles County-Ventura County line. High TDS concentrations are common in the Santa Clara River Valley area.

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Los Angeles River Basin

The Los Angeles River Basin area is located in southern Los Angeles County and is drained by the Los Angeles River, San Gabriel River, and Malibu Creek.

Surface water sources. The Los Angeles River system has minor water quality problems that are attributable to high pH, nitrate/nitrite, chlorine levels, and low dissolved oxygen. The Los Angeles River drainage includes large recreation and wildlife habitat areas in the San Fernando Valley. Minor water quality problems caused by urban runoff and point source discharges have occurred in urbanized portions of the San Gabriel River drainage system, but good water quality exists in the source areas of the San Gabriel Mountains. Malibu Creek and its tributaries are an intermittent stream system that drains a portion of the western Santa Monica Mountains. This drainage area has high TDS levels, and water quality has been reduced by wastewater discharge into the creek.

Groundwater sources. This area includes the Los Angeles Coastal Plain, San Fernando Valley, and San Gabriel Valley Basins. Water quality in the Los Angeles Coastal Plain Basin is generally good, although saltwater intrusion has been a problem along the coast. Quality is generally good in the San Fernando Valley Basin but the quality of water extracted by the City of Los Angeles has deteriorated due to overdrafting and intrusion of poorer quality groundwater. Localized problems brought about by high nitrate, toxics, and TDS levels have occurred in the San Gabriel Valley Basin, and a major Superfund groundwater decontamination project is in progress in this area.

Santa Ana River Basin

The Santa Ana River Basin area is located in Orange County and the western (nondesert) portions of San Bernardino and Riverside Counties.

Surface water sources. ~~Improper~~ operation of individual sewage storage or treatment systems in the upper Santa Ana River area has degraded stream water quality. High TDS and nutrient levels have reached lower portions of the river due to rising groundwater of low quality, urban runoff, and nonpoint agricultural pollution. Lakes in this area receive water from the SWP and Colorado River and have fair to good water quality.

Groundwater sources. Primary groundwater basins in this area include Orange County Coastal Plain, Upper Santa Ana River Valley, San Jacinto, Elsinore, and San Juan Creek. Groundwater quality is generally good in this area. Deterioration has occurred, however, due to recharge by Colorado River water, percolation of irrigation wastewater, overdrafting, seawater intrusion, and mineralization, and water quality was compromised further by municipal, industrial, and agricultural waste disposal. Groundwater problems have been alleviated by an increased use of Colorado River water by southern Orange County.

Marine Water

The coastal waters of the SCAG region consist of the southern portion of Santa Barbara Channel, Santa Monica Bay, and the San Pedro Channel, including San Pedro Bay.

The circulation of nearshore marine waters determines the extent to which pollutants are diluted and distributed. Nearshore water circulation patterns are determined by the major currents formed by the southeastward-flowing California current and its eddies, the onshore-offshore tidal currents (which are especially important in enclosed bays and estuaries), and the effects of wind and local topography.

Pollutants are introduced into the marine environment by point and nonpoint discharges. Point source discharges include effluents from municipal sewage treatment facilities, industrial wastewater discharges, and cooling water discharges (primarily from utility power plants). The most important source of nonpoint discharges is runoff from land, particularly urban storm runoff. Pollutants of greatest concern are heavy metals (e.g., zinc, copper, lead, cadmium, and mercury), nutrients such as nitrates and phosphates, and trace organic compounds such as halogenated hydrocarbons.

In general, offshore water subject to the diluting effects of major current systems has not been substantially degraded. In localized areas, however, with the weak current systems of some bays and estuaries, substantial degradation has occurred, and concerns are mounting over the adverse effects on ecosystems and public beaches in these areas.

Desert

The desert subregion includes most of San Bernardino County, eastern Riverside County, and Imperial County.

Surface water sources. Few water quality problems exist in this area with the exception of the Salton Sea vicinity, which has high and increasing salinity as a result of irrigation return flows, increasing salinity of Colorado River water, and inadequately treated municipal discharges (particularly from sources in Mexico).

Groundwater sources. Groundwater quality problems in the South Lahontan basin, located in desert portions of Los Angeles and San Bernardino Counties, include overdrafting and pollution from mining and sewage wastes. West Colorado River Basin water is mostly unusable, and the use of East Colorado River Basin water is limited as a result of increasingly high salinity near the Colorado River. Local groundwater supplies along the Colorado River are also poor where they are affected by saline river water, failing septic tanks and leachfield systems, and irrigation return flows.

Impacts and Mitigation Measures

Since the 2010 regional population is assumed to be the same under the proposed project and alternatives, and water demand is assumed to be proportional to population, effects of the various growth projections on water supply would be comparable at a regional level.

Proposed Project

Impact: Regional Water Supply Shortfall of 1.2 in 2010

Water supply and demand projections are shown in Table 6-1. Water demand in 2010 will be influenced by such factors as population growth, levels of agricultural production, land use patterns, water costs, and water conservation measures. It is assumed that urban per capita water consumption rates would decline by approximately 5 percent by 2010 as a result of water conservation measures and increased housing densities (Southern California Association of Governments 1987).

Water demand projections for urban and agricultural uses are based on "normal" weather conditions, although per capita use may vary significantly from year to year depending on rainfall and temperature levels. Estimates of dependable supply levels are based on "dry" periods, with higher levels expected in "normal" or "wet" years and lower levels expected in extremely "dry" or drought years. Such projections assume that both local and Los Angeles Aqueduct supplies remain stable but do not include additional yields

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that may become available to the region (e.g., through cooperative water management programs with irrigation districts, the State, or the U. S. Bureau of Reclamation) because of their uncertainty. The potential effects that changes in water pricing would have on supply and demand are not considered in this analysis.

Substantial increases in urban water demand from population growth expected under the proposed project and smaller declines in agricultural water demand would increase regional water use by approximately 0.86 MAF (12.2 percent) between 1984 and 2010. Urban demand would increase by 0.95 MAF (31.7 percent) and agricultural demand would decrease by 0.08 MAF (2.0 percent). By 2010, agriculture and urban uses within the region would demand approximately the same amount of water. Approximately 58 percent of regional water demand in 2010 would come from the outlying subregion, based largely on agricultural water use (Southern California Association of Governments 1987).

DWR water demand projections for the MWD service area (including San Diego County and excluding Imperial County) indicate similar patterns among agricultural and urban land uses. Agricultural water use in this area is expected to decline by 0.24 MAF (17 percent), from 1.4 MAF in 1985 to 1.16 MAF in 2010, as irrigated acreage and water use per acre continue to fall. However, DWR has also projected that agricultural water demand in the San Diego Hydrologic Study Area will increase during the same period by 1.5 percent as the result of 4.6 percent growth in irrigated agricultural acreage within that area (State Water Contractors 1987a).

NOT TRUE
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to our
sources

Urban water demand in the MWD service area is projected by ^{MWD} DWR to increase 0.94 MAF (30.3 percent), from 3.10 MAF (1985) to 4.04 MAF (2010). Approximately half of this increase would be generated in Ventura, Los Angeles, and Orange Counties, with the balance generated in Riverside, San Bernardino, and San Diego Counties. The rate of increase would be highest in Riverside County (95 percent) and San Bernardino County (81 percent), and lowest in Los Angeles County (15 percent) and San Diego County (37 percent). Water demand by commercial and institutional uses is expected to grow at the greatest rate (49 percent) from 1985 to 2010, with residential demand increasing by 32 percent, industrial demand increasing by 20 percent, and demand from public and unaccounted uses increasing by 13 percent (State Water Contractors 1987a).

During this period, dependable supplies ^{for the SCAG region} are expected to decline by 0.76 MAF (10.2 percent). These trends would result in a projected shortfall of 1.20 MAF in 2010, with supplies meeting less than 85 percent of total demand in that year. Lesser shortfalls would be expected in wet years and greater shortfalls would be expected in dry years.

The effects of increased water demand resulting from the proposed project would vary geographically within the region. The projected shortfall would be more severe in the coastal plain subregion, where dependable supplies total 2.60 MAF (78.8 percent of projected demand). Supplies would be expected to meet 89.2 percent of the demand in the outlying areas.

Cumulative projections by the MWD indicate an even more severe shortfall. The MWD forecasts a deficit of approximately 1.0 MAF in 2010

based on a 3.37 MAF supply that would meet 77.5 percent of estimated total demand (4.35 MAF) within the MWD service area ^{including San Diego County} (Chan pers. comm.).

Although total water demand levels would increase less rapidly than population growth under the proposed project, the increase is considered a significant impact as a result of projected shortfalls and the many constraints affecting both local and imported supplies.

This impact is considered significant but could be reduced to less than significant through implementation of the following measures, which are based on regional and statewide plans and projects (California Department of Water Resources 1987, Boronkay 1988).

Mitigation Measures

- o The MWD and other water providers in the region should increase dependable annual supplies at a regional level by 2010 to at least 8.0 MAF and make the fullest use of existing resources by implementing the following measures as needed:
 - increase SWP yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements (including completion of Delta Pumping Plant, South Delta improvements, North Delta improvements, ^{North} Delta water management, ~~and Delta levee improvements~~), offstream storage programs (including Kern Water Bank, Los Banos Grandes Reservoir, ~~Kellogg/Los Vaqueros Reservoirs~~, and Delta island reservoir storage), CVP programs (including interim water supply acquisition and New Melones Reservoir conjunctive-use program), and other SWP programs (including Cachuma Reservoir enlargement); and implementation of water transfer agreements ~~between agricultural and urban SWP contractors.~~
 - obtain maximum use of Colorado River supplies through implementation of various programs, including use of available surplus water from agricultural agencies and other states, Imperial County groundwater storage and recovery, Imperial County water conservation and surplus water diversion, Coachella Branch and All-American Canal lining projects, Palos Verdes Irrigation District water utilization, and Colorado River water banking;
~~Participate in programs to store~~
~~store up to 3.0 MAF of surplus~~ water in groundwater basins (e.g., Main San Gabriel Basin, Chino Basin, Coachella Basin, and San Jacinto Basin) as indicated above, provided that potential adverse effects on groundwater quality can be avoided or adequately mitigated; and
 - make optimum use of existing resources and minimize adverse effects of supply shortfalls by expanding and implementing other programs, including local wastewater reclamation, groundwater protection, groundwater treatment, water conservation,

RESPONSES TO THE COMMENTS OF THE METROPOLITAN WATER
DISTRICT OF SOUTHERN CALIFORNIA

10. The "Water Supply and Quality" section of Chapter 6 has been amended in response to Metropolitan Water District staff's corrections and additions, as indicated in the errata to pages 6-1, 6-2, 6-3, 6-4, 6-6, 6-8, 6-9, 6-10, and 6-11 of the DEIR.

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division

Keith A. Turner
Manager

November 16, 1988

Paul Hatanaka
SCAG
600 S. Commonwealth Ave, Suite 1000
Los Angeles, CA. 90005

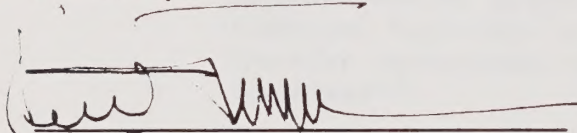
SUBJECT: Growth Management Plan

Dear Mr. Hatanaka

Thank you for the opportunity to review the subject document. This report was circulated to interested County agencies for review. The response is attached.

If you have any questions, please call Kim Hocking at (805) 654-2414 and he will direct you to the appropriate staff member.

Sincerely,



Keith Turner
Manager

Reference No. 88-133

KT:sm

cc: APCD - Mount
Attachments:

NOV 17 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY

MEMORANDUM

TO: Kim Hocking, Planning DATE: November 11, 1988
FROM: Bill Mount, APCD *BM* 88-133
SUBJECT: SCAG Growth Management Plan EIR

Chapter 8, Air Quality, of the subject EIR focuses on the South Coast Air Basin (SCAB). While Ventura County Air Pollution Control District (APCD) staff recognizes that this air basin is of greatest concern to the Southern California Association of Governments (SCAG), APCD staff recommends that Chapter 8 include a discussion of Ventura County's air quality problem and the findings of the recently adopted 1987 Ventura County Air Quality Management Plan (AQMP). There are two reasons for this recommendation. First, Ventura County is part of the SCAG planning area. Second, Ventura County has one of the most severe air quality problems in the country, frequently exceeding the national ambient air quality standard for ozone.

The 1982 Ventura County Air Quality Management Plan, the predecessor to the 1987 AQMP, predicted that Ventura County would not attain the federal ozone standard any time this century. However, the analyses done for the 1987 AQMP did not provide the information needed to predict a specific attainment date. While the 1987 AQMP does not specify an attainment date, the emission forecasts used in the 1987 AQMP decrease until about 1995 then increase thereafter. The emission increases are due almost entirely to population growth overshadowing emission reductions associated with the control tactics contained in the 1987 AQMP.

The Environmental Protection Agency recently disapproved the 1982 AQMP for failure to demonstrate attainment of the federal ozone standard by December 31, 1987. The disapproval was the result of a citizen lawsuit brought against EPA pursuant to Section 304 of the Clean Air Act. Consequently, EPA is expected to develop and implement a federal implementation plan (FIP) for Ventura County which will demonstrate attainment of the federal ozone standard by a specified date.

The 1982 and the 1987 Ventura County Air Quality Management Plans, and associated documents, are available from the APCD. If you wish to obtain any of these documents or have any questions, please contact Chuck Thomas of my staff at 805/654-2799.

RESPONSES TO THE COMMENTS OF THE COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY

11. Information from this letter regarding attainment of air quality standards in Ventura County is hereby incorporated into the DEIR. SCAG would like to continue to work with Ventura County in their air quality planning efforts.



CITY OF ANAHEIM, CALIFORNIA

Office of City Manager

TRANSPORTATION
PLANNING DEPARTMENT

November 17, 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

Ms. Kathy Jones Irish
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
600 So. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Re: Formal Comments - Draft Growth
Management Plan and EIR, and
Regional Mobility Plan

Dear Ms. Irish:

Thank you for the opportunity to review the above mentioned regional plans. It is recognized that cities should cooperate in the regional setting to address regional issues. To this end, we are pleased to submit the following comments based on the information provided in the Draft Growth Management Plan, the DGMP EIR, and the Regional Mobility Plan for consideration.

GROWTH MANAGEMENT PLAN AND ACCOMPANYING EIR

Review of the two documents are out of sequential order as with other Plans (Air Quality Management Plan, Housing Needs Assessment Plan, etc.) which are to be predicated from this Plan. These Plans have already been adopted and/or reviewed, or were under current review prior to distribution of this document. The Draft Plan and accompanying EIR were not received by the City until the week of October 24, 1988. With the allotted time frame for comment, it is not feasible for the City and its affected departments to review, understand and prepare informed comments on the Draft Plan and EIR, as well as their relationship to previously distributed Plan documents. Specific information relative to Anaheim is not stated and further complicates the review of the document, leading to ambiguity.

Notwithstanding the above, many comments/questions are raised upon review of these two referenced documents. General and specific comments are noted below.

GENERAL COMMENTS:

1. It is difficult to specifically address impacts to Anaheim as the Plan organizes its data on a regional, county, and subregional basis (subregional splitting Orange County, and subsequently Anaheim, into west/east sections). Data specifically for Anaheim is not identified.
2. The projections identify growth through the year 2010 for the region. It is important to note that while the thrust of the Draft Plan describes the Baseline Projection with a small discussion on the alternatives, the EIR describes the preferred project alternative as GMA-4 Modified Job/Housing Balance Alternative.

In summary, baseline projections for Orange County indicate that:

"Between 1960 and 1984 the county's population tripled and reached a 1984 population of 2.1 million. By 2010, the Baseline projects 3.1 million people in Orange County...an addition of 1.0 million--double the pace of Los Angeles County, however, significantly slower than both Riverside and San Bernardino Counties.

Orange County is projected to grow from 760,000 housing units in 1984 to 1.2 million in the year 2010, an addition of 464,000 housing units during the 26-year period. This growth represents 17% of the region's projected housing growth--a smaller share than the 27% captured during the period between 1970 and 1984.

Orange County had 1,048,000 jobs in 1984, or 18% of the region's total employment. By 2010, the county is projected to add 877,000 jobs (87% increase), which is about 29% of the projected regional increase in jobs between 1984 and 2010. By 2010, Orange County's employment is projected to be 1,925,000. Orange County will account for 22% of the region's total employment, a slight increase in its regional share from 1984."

However, 2010 projections for the preferred GMA-4 Modified Job/Housing Balance Alternative (Jobs/Housing concept is to provide a comparable ratio of jobs and housing within a community/region to not necessitate unnecessary mobility requirements) indicate the following projections for Orange County between 1984 and 2010 under The Trend Projection:

Population:	2,982,200
Housing:	1,191,900
Employment	1,691,800

The preferred GMA-4 Modified Job/Housing Balance Alternative projects less population, housing and employment (117,800, 8,100, 233,200, respectively) for Orange County than the baseline projection identified above. This inconsistency should more clearly be addressed.

3. Without specific data on Anaheim, it is impractical to determine the impact on public services and infrastructure in Anaheim. If this Plan is adopted and implemented, what impacts on Anaheim's infrastructure/services will occur (i.e., water, wastewater treatment, solid and hazardous waste, energy, school facilities, circulation systems, etc.) and how would improvements found necessary be funded? As stated previously, the Plan should provide information enabling local jurisdictions to analyze said impacts.
4. Many of the policies set forth in the Growth Management Plan are ambiguous and unclear. It is difficult to provide comments on behalf of Anaheim due to the generality of the document. The document should specifically identify the cities in each county and subregion and indicate whether SCAG currently views each as job-rich, job-poor, housing-rich, or housing-poor. Specific comments cannot be offered until that effort is completed. Each policy is listed below with departmental comments in brackets following each policy.

- o "Achieve better job/housing balance at the subregional level. Encourage and provide incentives in job-rich subregions to attract housing growth; and encourage and provide incentives in housing-rich subregions to attract job growth."

[It is not clear, based on the current Plan, whether Anaheim would currently be viewed by SCAG as job-rich or job-poor and housing-rich or housing-poor. The implied outcome could negatively affect Anaheim's future development/economic viability.]

- o "To the degree possible, achieving a balance (by subregion) of the type of jobs with the price of housing."

[How will this be achieved and who will have the authority to determine appropriate pricing?]

- o "Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures."

[How will this be accomplished and what economic development measures will be employed?]

- o "To the extent possible, reflect current local jurisdictional policies related to population, housing and employment in the development of job/housing balance targets."

[The current array of local jurisdictional policies relating to the accomplishment of jobs/housing balance targets is not documented.]

5. Many of the implementation processes identified are ambiguous and unclear. Again, it is difficult to provide comments on behalf of Anaheim due to the generality of the document. The document should specifically identify the cities in each county and subregion and indicate whether SCAG currently views each as job-rich, job-poor, housing-rich or housing-poor. Specific comments cannot be offered until that effort is completed. The various components of the identified implementation measures are listed below with departmental comments in brackets following each implementation measure.

- o "Local jurisdictions should develop general plans that incorporate regional and local job/housing balance objectives as well as elements of the Air Quality and Regional Mobility Plans. Local jurisdiction adoption of measures and ordinances that foster job/housing balance is targeted for January 1, 1990."

[If the City is directed to amend Anaheim's General Plan per the GMP, the City could potentially lose its discretion on the future shaping of Anaheim as related to some of the Vision 2000 (Strategic Planning) Strategies. Further, staffing and the cost to accomplish suggested General Plan amendments are undeterminable at this time.]

- o "SCAG's task is to promote implementation of the job/housing balance policy. The A-95 Review program is a vehicle through which the agency can review projects and make recommendations for federal funding. SCAG can influence the issue of federal resources to a project which adversely impacts the job/housing balance in a subregion. The Transportation Improvement Program is another mechanism that can be used by the agency. SCAG can recommend that funds for transportation projects be consistent with the objectives of the job/housing balance policy."

[It is unclear at this time how this Plan could affect Anaheim's potential funding from various sources for future projects.]

- o "County Transportation Commissions can participate in the implementation process through programming of transportation funds. By making revisions to the New Source Review Rule, the South Coast Air Quality Management District can influence the location of proposed commercial and industrial projects in a way that enhances the objectives of job/housing balance and eases attainment of subregional targets."

[The City potentially could lose its ability to determine its destiny regarding location of commercial and industrial projects. If it is determined that commercial and/or industrial development should not occur in Anaheim due to the job-housing balance, Anaheim's economy could be affected?]

Assessment of Consistency with Targets (proposed evaluation criteria)

- o "Projects which should be exempt from the review and mitigation process are proposals for low-income housing, for senior citizen housing and proposals to add needed jobs in economically depressed areas."

[Projects in the City of Anaheim may or may not be exempt as criteria for low-income housing is not identified. Also, projects of this nature typically require mitigation measures to protect the health, safety and general welfare of the City depending on the location and magnitude.]

- o "Projects which the local jurisdiction wishes to approve, but which exceed local targets and contribute to job/housing imbalance at the subregional level could require conditional permits until mitigation measures that bring the subregional job/housing balance within the targeted ratio are met."

[It is not clear whether SCAG currently views Anaheim as a targeted area of job/housing imbalance or not. If Anaheim is designated a targeted area of job/housing imbalance, who will direct or advise such stated actions or implementation measures and where will funding come from? Further, how much additional time will requested approvals take? Who will review for Plan consistency? Will the City be able to respond to comments and/or what role will the City play in the decision-making process?]

- o "Housing projects in job-rich subregions and job development projects in housing-rich subregions should not be subject to review and conditional permitting as long as they contribute to further balancing at the subregional level. Such projects should be encouraged and granted additional incentives."

[It is unclear whether SCAG currently views Anaheim as job-rich or job-poor. If projects in these areas are not subject to review and/or conditional permitting, how will infrastructure be determined and accommodated, and further, funded?]

Local Government Implementation Measures

- o "For proposals that worsen the job/housing balance in a subregion, require mitigation measures to be borne by the project."

[What type of mitigation measures? Should a balanced community be penalized for imbalances in the remainder of the subregion?]

18
Con

- o "Establish regional and local priorities for building the infrastructure needed to support job/housing balance."

[This measure may require inter-agency coordination which could be sensitive and difficult to accomplish and enforce from a practical standpoint. Who will determine the priorities and on what criteria will they be based?]

- o "Target basic industries. This is a tool which can be used by job-poor localities to identify growing industries and attract them by providing the proper incentives, such as tailoring their economic activities to the industries' requirements."

[Will industries in Anaheim be tempted to relocate, and if so, how would that affect the current economic balance of the City?]

- o "Encourage housing development in job-rich subregions in accordance with allocations in the regional housing needs assessment by providing developers with additional incentives."

[What type of incentives?]

- o "Reduce housing construction limitations in job-rich areas."

[What type of housing reduction measures are suggested? This measure could impact the quality of housing built.]

- o "Link the transportation demand management measures to the job/housing balance measures."

[What is envisioned with this policy?]

6. How were the models derived and what data from what sources were used? The documentation does not clearly indicate. What assumptions were used? A listing should be provided.

OVERVIEW/SUMMARY

As indicated in previous comments, this Plan should include identification of more specific information with respect to the City of Anaheim regarding the potential impact upon our current policy direction toward economic development, business growth, land use opportunities, building activity, housing and employment opportunities, impacts upon the population growth and the Zoning Code and current goals of the General Plan. It is unclear what control or discretion the City of Anaheim will have in directing the future destiny of development in the City. It is also unclear which implementation measures would affect Anaheim dependent upon the City being classified as either job-rich or job-poor and housing-rich or housing-poor. The Plan should identify SCAG's perspective regarding these classifications. Other questions such as why a balanced community should be penalized for imbalances in the remainder of the subregion need to be addressed? It is recognized that the City should cooperate in the regional setting to address regional issues. However, development in Anaheim could be directly impacted upon this Plan's implementation.

Implementation measures suggest the General Plan and possibly the Zoning Code be amended to accommodate measures identified in the Plan. Further, the development approval process could be lengthened through implementation measures identified in this Plan. Revenues from Planning Department functions may decline while costs rise to implement proposed measures. Increased staffing levels could be necessary to implement the Plan.

The proposed Plan appears ambiguous, altruistic and contains a number of measures that could have adverse impacts upon local decision-making. It is not stated how many of the programs or infrastructure improvements will be accomplished or funded, or how this Plan could impact various funding sources to the City. Anaheim's balanced economy could be negatively affected through implementation of the Plan. Certain implementation measures could negatively impact the quality of housing built and associated pricing. Adjacent communities and cities in the region/subregion could be placed in conflict with one another due to implementation of this Plan.

DRAFT REGIONAL MOBILITY PLAN

In a cursory review by City staff, the following comments/issues have been raised regarding the Draft Regional Mobility Plan:

- o The Regional Mobility Plan states that transit usage will increase by 19% by the year 2010, however, it does not state how this will occur. To state that transit usage will be tripled without indicating the proposed strategies, marketing of those strategies, and the related funding is, to say the least, "a clouded point."

Ms. Kathy Jones Irish
November 17, 1988
Page Eight

- o Reference is made to demand management strategies and centers indicating alternative work schedules and telecommuting as a means of reducing home-to-work person trips. However, implementation procedure is not suggested or mentioned. These strategies will create up-front costs on the part of many businesses and their operating procedures. Again, economics and practicality do not seem to be considered in the Plan.
- o The recommended mitigation measures state that no regionally significant adverse impacts are expected, however, there are some impacts that are local in nature that do not require mitigation. Regardless, local adverse impacts will need mitigation. Since the Regional Mobility Plan DEIR is an environmental impact report, it seems as though mitigation measures should be recommended to remedy adverse impacts. To state that the adverse impacts are local after being created by a regional plan does not seem accurate - especially for freeway widening/construction projects.

In conclusion, on behalf of the City of Anaheim, I would like to strongly urge that SCAG seek a forum by which public and private entities may assist in revising the proposed plans to further develop and enhance regional planning issues in a coordinated, multi-jurisdictional, and all-encompassing fashion.

Again, thank you for the opportunity to review these plans.

Sincerely,



BOB D. SIMPSON
CITY MANAGER

BDS:KT:mlf

c: City Council
OC City Managers
OC Division, League of California Cities

1497W

RESPONSES TO THE COMMENTS OF THE CITY OF ANAHEIM

12. See Response 1.
13. As stated on page 1-2 of the DEIR, State CEQA Guidelines require that EIR impact analyses correspond to the degree of specificity involved in the underlying activity being analyzed in the EIR. Due to the programmatic nature and regional scale of the GMP forecast, impacts related to the Draft GMP are assessed at a regional level. Local impacts can be more appropriately addressed at a local level.
14. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
15. The baseline projections described in Chapter III of the GMP is the same as GMA-1 evaluated in the GMP DEIR. The recommended alternative discussed in Chapter VII of the GMP is the same as the proposed project (or GMA-4 Modified Jobs/Housing) evaluated in the GMP DEIR; SCAG's Executive Committee has selected this alternative as the preferred one.
16. See Response 1.
17. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
18. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
19. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
20. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
21. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
22. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
23. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.

Memorandum

To : State Clearinghouse
Office of Planning & Research
1400 10th Street
Sacramento, CA 95814

Attention: Keith Lee

Date : November 17, 1988

File No.: Riv-Var-Var
SBd-Var-Var
SCH# 88062924
SCH# 87121613

From : DEPARTMENT OF TRANSPORTATION
District 8

Subject: Southern California Association of Government's Growth Management
Plan and Regional Mobility Plan

We have reviewed the above mentioned project and offer the following comments:

Concerning the proposed facility improvements, the documents should state a tentative date for the implementation of the programs. In addition, the document should state whose responsibility the implementation of these programs will be, to insure that the improvements are built.

Lastly, individual notices for specific projects should be sent for review so that specific issues can be addressed.

If you have any questions, please contact Richard Malacoff at ATSS 670-4550 or 714-383-4550.



GUY G. VISBAL
Chief, Transportation Planning Branch

RM:cj
bcc: GSmith, Plan Coord Unit, DOTP
Paul Hatanaka, SCAG

CI

NOV 17 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

RESPONSES TO THE COMMENTS OF CALTRANS, DISTRICT 8

24. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.

25. Comment noted.



November 17, 1988

NOV 18 1988

SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS

Ms. Viviane Doche-Boulos
Southern California Association of Governments
600 South Commonwealth Avenue #100
Los Angeles, CA 90005

Dear Ms. Doche-Boulos:

I am writing in response to the SCAG draft Growth Management Plan, Regional Mobility Plan and associated EIRs.

My first comment concerns the inadvisability restricted review period for these several and closely related documents. A thirty day review is unprecedented in my experience for major projects of this nature. I was surprised to learn that SCAG would ask for a shortened review period and even more amazed that the State would give it serious consideration. Add to that the fact that review of all of these related documents needs to be complete in the same reduced time frame and it makes the task of my staff impossible. Therefore, I am formally requesting not only that the standard 45-day review be reinstated, but also that the review be extended by an additional 45 days as provided in CEQA. This request has already been submitted to the State Clearing House.

Given the fact that this request may not be granted, I will attempt to address our most significant concerns at this time. Many of these have already been addressed in our response to the South Coast Air Quality Management District in response to the proposed AQMP and associated EIR (see attached letter dated October 17, 1988.) Further review of SCAG's Growth Management Plan and Regional Mobility Plan leave us with greater rather than less concern about the central issue in this entire process, namely implementation.

Chapter VIII in the Growth Management Plan purports to address this issue; yet the reader is left confused by the ambiguity which one finds in this section. The statement is made on page VIII-1 that implementation strategy "...is based on the voluntary participation of local jurisdictions." Nevertheless, on pages VIII-3 and VIII-4 the same document outlines how SCAG, the South Coast AQMD, and other agencies could enforce these policies using A-95 Review, federal funding, New Source Review and other mechanisms. On page A2-5 (in Appendix 2, entitled Job/Housing Balance Strategies/Techniques) the following policy option is stated: "Local governments would be required to conform to SCAG recommendations on local proposals for development or changes in regulations." When confronted with this inconsistency, a member of SCAG's staff said, in effect, that the program would be voluntary unless jurisdictions do not to

Page 2
Viviane Doche-Boulos
November 15, 1988

comply. We find this a curious sort of voluntarism. In short, we continue to feel that these documents do not provide a clear notion as to what will be required of our City by these plans and what quid pro quo will be provided by other jurisdictions in order to achieve our mutual goal of clearer air.

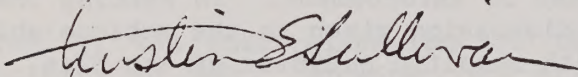
27
Cont.

There has also been recently adopted State legislation (Chapter 1568) which may give SCAQMD review power over indirect air pollution sources. We specifically ask whether this new power would be used to support the Growth Management Plan and Regional Mobility Plan. Furthermore, we would like you to explain how these programs can be considered voluntary if these new provisions are implemented.

28

Yours truly,

ONTARIO PLANNING DEPARTMENT
Joyce I. Babicz, City Planner



Austin Sullivan
Senior Planner

AES:rb

cc: J. Babicz
J. Freiman
J. Hamerslough



October 17, 1988

Ms. Suzanne Reed
Special Projects Coordinator
South Coast Air Quality Management District
9150 Flair Drive
El Monte, CA 91731

Dear Ms. Reed:

I am writing in response to the notice of completion for the EIR for the proposed 1988 revision to the AQMP.

I believe that the issue which creates the greatest concern in this jurisdiction, and, I suspect others, is that of enforcement. In reading these voluminous documents, there is no serious discussion given to the actions which might be employed to require compliance with specific policies of the plan. As I am sure you are aware, some of the proposals, especially in the supporting appendices to this document, are controversial and issues of implementation are central to the problem, not peripheral. In short, we do not feel that these documents give us a clear idea as to what will be required of this City by the plan and what quid pro quo will be provided by other jurisdictions. We have a difficult time supporting this open-ended approach to the problem.

Specifically, there are certain actions which this jurisdiction is unlikely to take even though we share the goal of clean air with the entire basin. For example, we have heard representatives from the State and SCAG propose, apparently seriously, such draconian measures as the issuance of occupancy permits before site plan review in order to stimulate housing formation in desired areas. As this pertains to the EIR, we ask, "How could one reasonably assess the likely impacts associated with this sort of abandonment of the standards which have heretofore been part of the normal review process?" We suggest that no such evaluation is possible. We also have serious questions about the advisability of pursuing further the jobs-housing balance strategy outlined in these several documents. The presumed goal of this strategy is to minimize average daily commuting distances which is, of course, desirable. Nevertheless, it would appear that the real problem is not housing availability. Rather the problem is one of cost. It is clear that, on a square footage basis, there is a general and rapid increase in the cost of housing as one proceeds westward from the Inland Empire into Los Angeles and Orange Counties. That situation is likely to obtain even if more housing is built in the western areas and more jobs are available in the east. As such, reduced commuting is not likely even if target goals are met. It is instructive that Orange County is presently in balance in the areas of jobs and

Page 2
Ms. Suzanne Reed
October 17, 1988

housing. Nevertheless, massive numbers of workers are exported each day to Los Angeles County and similar numbers arrive from the Inland Empire. This situation is likely to continue without large scale market intervention, a course of action which is not likely to be given serious consideration. Thus, there is no reason to assume that improved jobs-housing balance will reduce average commutes if the issue of cost continues to go unaddressed.

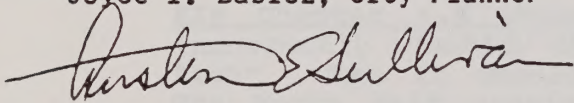
Moreover, the basic structure of the EIR is drawn into question because of the nature of the proposed AQMP, itself. Specifically, the AQMP proposes three tiers of policy with considerably different provisions. The third of these goes so far as to rely on technologies which may or may not be ready for implementation by 2010 A.D. Thus, the project, as defined by CEQA, is, and must be, illdefined. As such, the EIR cannot hope to adequately address the possible impacts associated with the plan. For example, the impacts associated with full electrification of transportation would be quite different depending on the means of generation used and the location of the generating facilities. Therefore, we suggest that additional environmental review will be necessary before any Tier III strategies are implemented.

Finally, the interrelatedness of these many and voluminous documents is unclear, at best. Moreover, not all documents have been distributed. We did not even know that there was a September, 1988 draft of the Transportation Land Use and Energy Conservation Measures document until Lloyd Zola of Planning Network chanced to inform us of its existence. The convoluted interrelationships of these various documents make a clear response to any of them more difficult.

If you have any questions, please call me at (714) 391-2506.

Yours truly,

ONTARIO PLANNING DEPARTMENT
Joyce I. Babicz, City Planner



Austin E. Sullivan
Senior Planner

AES:rb

RESPONSES TO THE COMMENTS OF THE CITY OF ONTARIO

26. See Response 1.
27. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
28. This comment does not relate to the adequacy of the GMP DEIR and is responded to in Appendix I of this report.



Ventura local agency formation commission
800 south victoria avenue ventura, ca 93008
(805) 654-2576

November 17, 1988

NOV 18 1988

SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS

Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles CA 90005

members

JOHN FLYNN
JAMES E. GORDON
VICKY HOWARD
MADGE L. SCHAEFER
DORILL B. WRIGHT

alternate members

ROBERT C. EMBRY
MAGGIE ERICKSON
ALEX FIORE

executive officer

ROBERT L. BRAITMAN

**SCAG Draft Plans and EIRs on Regional
Mobility and Regional Growth Management**

This is in response to your request to review the above referenced documents. Our comments are offered in the Commission's role as a responsible agency with respect to potential boundary changes which may result from the implementation of these Regional Plans.

DRAFT PLAN AND EIR ON REGIONAL MOBILITY

Resources - These documents should, at least for the Ventura County portion of SCAG, identify oil and gas, mineral (aggregate) and farmland resources. These represent an important part of Ventura County's economic base and the Draft EIR should evaluate projected impacts on these resources.

EIR Chapter 4.F Water Resources -The Project Impact/Growth Management section should address whether projected growth would exceed the firm and safe yields of existing water supplies (A crucial question in Southern California).

EIR Chapter 4.K Urban Form and Growth - Figures 22 and 23 incorrectly identify the North Half of Ventura County as "Housing Rich" when it should be identified as "Mountain and Desert". The North Half consists primarily of remote mountainous areas lying within the Los Padres National Forest.

This chapter should also contain an evaluation of how the Regional Mobility Plan will impact LAFCO adopted Spheres of Influence in Ventura County and the County's Guidelines for Orderly Development. Jurisdictional patterns within Ventura County, influenced by the Guidelines, are much different from patterns in the other Counties within the SCAG Region. These Guidelines provide the framework within which urban development is directed to existing cities whenever and wherever practical

Mark Pisano
November 17, 1988
Page Two

rather than providing opportunities for urban development to locate in the unincorporated area.

Draft Regional Plan - The Draft Regional Plan should also include a discussion of the Ventura LAFCO Sphere of Influence program and the County's Guidelines for Orderly Development.

EIR Chapter 4.L Regional Economy - The discussions in the Employment by Sector section on page 133 should identify each County's employment by Sector and their share of County employment in addition to employment in the SCAG Region as a whole. It is somewhat misleading to state, for instance, that Agriculture employs 70,000 (a 1% share of Regional employment) when this industry represents a much greater share of the Ventura County employment base.

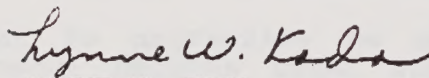
Please consider including in the Employment Centers section on page 134 a discussion of employment centers within Ventura County even though the employment densities are below 15,000 employees per square mile. The location of employment centers is significant when anticipated growth areas within the County are taken into consideration.

DRAFT EIR AND REGIONAL GROWTH MANAGEMENT PLAN

This Plan should also identify the above referenced issues and the Draft EIR should evaluate potential Plan impacts on these Ventura County resources, plans and policies.

We appreciate the opportunity to review these documents. If we can be of further assistance on this matter, please contact the LAFCO Office at 805/654-2576.

ROBERT L. BRAITMAN
Executive Officer


LYNNE W. KADA
Staff Analyst

THE FIVE COMPANY

RESPONSES TO THE COMMENTS OF THE VENTURA LOCAL
AGENCY FORMATION COMMISSION

29. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
30. Refer to the RMP/RMP FEIR for a discussion of these issues.



THE IRVINE COMPANY

November 18, 1988

SOUTHERN CALIF. ASSOCIATION
OF GOVERNMENTS

NOV 18 1988

Mark Pisano, Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90007

Subject: Draft EIR for the Draft Growth Management Plan,
October 1988

Dear Mr. Pisano:

We appreciate the opportunity to comment on the Draft EIR for the proposed regional Growth Management Plan. Our preliminary review of the document has raised several issues:

First, the regional Growth Management Plan is a key piece of regionwide information and guidance. As such, the document is far too important to be rushed through a thirty day review. Copies of the DEIR were not readily available to the public until well after the start of the comment period, which will greatly constrain SCAG's ability to correct errors, respond to legitimate public concerns, and refine the Growth Management Plan.

Second, the baseline against which jobs/housing balance impacts have been measured in the DEIR is not the same as that used for modelling the transportation impacts of GMA-4 Modified, the preferred growth projection. Thus, it is impossible to tell how much of the VMT reduction and other benefits attributed to GMA-4 Modified are actually due to attempts to balance jobs and housing, and how much is due simply to the difference in baseline. This is a fundamental problem that should be addressed in the DEIR.

Third, the DEIR does not examine any alternative configuration of subregions. All seven alternative growth projections are disaggregated into the same subregions, which are strongly shaped by political boundaries rather than housing and employment market areas. What are the impacts of jobs/housing balance if the subregions are defined differently? Subregional impacts are not presented in sufficient detail for a clear understanding of the changes that would occur under each of the alternatives.

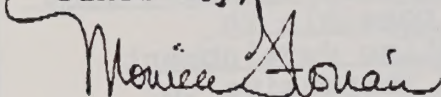
Fourth, the DEIR should discuss the impacts of the alternative projections on wage-earners per household. This measure of jobs/housing balance, a critical indicator of GMA-4 Modified's impact at both the regional and subregional level, is not addressed in the document.

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In addition to these issues, we have outlined other concerns and issues on the attached paper.

We urge that these issues be fully addressed prior to adoption of the Growth Management Plan and certification of the EIR.

Sincerely,



Monica Florian
Vice President
Resource Entitlement

MF/ah

COMMENTS OF THE IRVINE COMPANY ON THE DRAFT SCAG GROWTH
MANAGEMENT PLAN EIR

DEIR Page TIC Comments

pp. 2-3 TIC supports the "Policies" listed on these two
to 2-4 pages.

p. 2-5 TIC strongly disagrees with the concept of defining
5-year jobs/housing targets by subregion. The notion
of mandating specific growth levels and "trading"
proposed "subregional allocations" is a flawed
strategy and will not achieve SCAG objectives for the
following reasons:

(1) Market Forces Shape the Evolution of Employment
Centers. It is simply not possible to
"mandate" employment-generating development
because such development is responsive to
factors such as composition of labor force
synergistic presence of similar industries
(e.g. high tech industries, finance), proximity
of major universities, proximity to airports,
etc. This is particularly true for high tech
industries which evolve in response to specific
types of labor force/synergy relationships. As
the County of Orange comments on the draft AQMP
have noted, a job shifted away from Orange
County may be more likely to end up in Silicon
valley or Singapore than in areas "targeted" by
SCAG for employment growth.

(2) Implications of Shift to Information/High-Tech
Economy.
As is noted in the draft RMP EIR: "Over the
past decade, there has been a dramatic shift in
the Southern California economic base. The
region has been undergoing a transition from a
goods-producing, manufacturing economy to an
information-based service economy. This shift
in the character of the Southern California
economy means that "most high-tech, high-skill
sectors within the service sector (e.g.
business, computer, legal, and health services)
are predicted to grow rapidly." "Employment
growth is expected to shift from industries
with a high proportion of low-skilled jobs to
industries with proportionately more
high-skilled jobs." (GMP EIR at p. 4-17).
This shift in the profile of the future labor
force means that the demand for housing will
reflect the desire of employees to live in
close proximity to the high-tech, information

industries of Orange County and Los Angeles. Accordingly. SCAG policies each sub-region rather than trying to shift jobs away from the areas that form the foundation of the high-tech/information industries.

- (3) Pacific Rim Orientation of Orange County. Although the Pacific Rim orientation of Los Angeles County is evident to most observers (e.g. the ports of Los Angeles/Long Beach, LAX), Orange County has also emerged with its own Pacific Rim relationships. The growth of TIC's Spectrum development has been strongly influenced by the presence of Pacific Rim companies with an even stronger emphasis projected for the future. This orientation and influence on employment growth is dependent on locational and synergistic relationships that cannot be exported to inland areas of the SCAG region through "allocations" of future employment.
- (4) Orange County is Projected to Continue to "Export" Workers. The County of Orange comments on the draft AQMP have portrayed the manner in which actual commute patterns show that more Orange County residents commute out of the county than do residents of other counties commute into the County. The graphics portrayed in Figures 7-3 and 7-4 corroborate the County's assertions. In this context, it would seem that more employment should be encouraged to locate in Orange County in order to provide jobs for County residents rather than shifting projected employment out of Orange County.

Thus, in our view, an air quality strategy focussing on quantitative shifts of employment from one portion of the SCAG region to another is contrary to the fundamental shifts in the Southern California economy noted in the DEIR itself and is not capable of being implemented. Rather than mandating regional shifts in housing and employment, the focus of the jobs/housing strategy should be to achieve jobs/housing balance in areas where market forces are determining the location of employment development. A jobs/housing balance standard could be defined that would serve both as a clear focus for the regional growth management/air quality strategy and as an objective performance standard by which local efforts to implement the regional strategy can be measured.

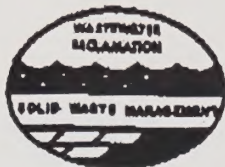
35
Cont.

TIC Comments
Page Three

- p. 4-11 Despite the obvious planning implications of differing DOF and SCAG projections for future employment and housing, the DEIR does not proposed any specific resolution of the differences in DOF and SCAG projections discussed in the text.
- p. 4-19 TIC supports the proposal to "increase the amount and density of planned future residential development" in housing-poor areas.
- p. 4-20 The proposed developer fees on commercial and industrial development in "job-rich subregions" would undermine the high-tech/Pacific Rim orientation of our economy and basically penalize industry for responding to real market forces and creating a vital economy. Instead of punitive measures, positive jobs/housing balance incentives should be provided.
- p. 4-20 TIC strongly opposes the proposal for "restricting economic development in job-rich areas" for the reasons cited in our comments relating to the proposed policy to establish employment generation targets.
- p. 4-20 TIC supports the concept of removing fiscal barriers to housing development and encourages the consideration of intraregional revenue-sharing or other measures that would counter the effects of fiscal deterrents to residential development.
- p. 4-22 The DEIR states that the most adverse effects of GMA-1 would occur in Orange County. TIC believes that the SCAG jobs/housing balance assessment does not adequately reflect the high ratios of employed persons per household experienced in central Orange County over the past decade. The reality of two wagearner households is such that rations of jobs/household are not accurate indicators of labor force participation in relation to housing. This conclusion is also contradicted by the DEIR's own figures regarding the flow of Orange County workers to Los Angeles County employment locations discussed above.
- p. 4-25 Given the high-tech/information services/Pacific Rim focus of much of the employment generation in Orange and Los Angeles Counties, it is simply not possible to state that "the proportional distribution of employment among industrial sectors is assumed to be similar for all alternatives.

RESPONSES TO THE COMMENTS OF THE IRVINE COMPANY

31. See Response 1.
32. The proposed project analyzed in the DEIR is GMA-4 Modified Jobs/Housing. Both the jobs/housing balance and transportation analyses in the DEIR use a consistent set of assumptions.
33. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
34. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
35. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
36. This statement in the DEIR refers to the assumption that the growth in the proportional share of employment in the services sector and the decline of the proportional share of employment in the manufacturing sector are likely to be similar for all the alternatives. This statement does not refute distributional differences among counties nor the fact that each alternative projects a different level of employment in each county. The amount of absolute employment growth in high-tech industries under each alternative would be related, in part, to total employment growth in Los Angeles and Orange Counties.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-4998
Mailing Address: P. O. Box 4998, Whittier, CA 90607-4998
Telephone: (213) 699-7411, (213) 685-5217

CHARLES W. CARRY

Chief Engineer and General Manager

November 18, 1988

File No: 31-230.70

Mr. Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

NOV 21 1988

Gentlemen:

Draft Growth Management Plan and Draft EIR SCH No. 88062924

The following comments are submitted in response to your request for review of the Southern California Association of Governments (SCAG) Draft Growth Management Plan and associated draft environmental impact report (DEIR).

DRAFT GROWTH MANAGEMENT PLAN

1. The Growth Management Plan (GMP) provides useful data on housing and population trends in Los Angeles County as a whole. However, its utility to the Sanitation Districts will be severely limited unless the data is sufficiently disaggregated so that the projected wastewater conveyance and treatment needs of the areas served by the Districts can be determined. For example, the GMA-4 Modified Job/Housing Balance Alternative projects an average daily wastewater flow (ADWF) in Los Angeles County of 1331 mgd by 2010, a population of 10.2 million, and a housing stock of 3.9 million units. Without knowing how much of this growth is projected for communities within the Sanitation Districts, and how this growth is planned to be distributed among the Districts, it will be impossible for the Districts to effectively evaluate the infrastructure needs for specific service areas which will be required to support SCAG's recommended alternative. Consequently, SCAG needs to disaggregate the forecasts based on the boundaries of the Sanitation Districts' Joint Outfall, Santa Clarita Valley, and Antelope Valley service areas.
2. The Sanitation Districts believe that the presentation on the disparity between the current wastewater conveyance and treatment facilities in the region and those anticipated to be required in the future is misleading. Because of the 1985 cut-off date for obtaining data, the GMP does not account for recently-initiated expansion projects. In addition, the GMP only considers projects which have been "funded". However, it does not consider systems such as the Districts' Connection Fee Program, which collects monies as new or expanded connections to the sewerage system are made and, thus, automatically funds the next increment of expansion. Hence, the Districts believe that the 2010 estimated wastewater treatment capacity "shortfall" is grossly overstated. SCAG should clarify its discussion of the impacts of the recommended alternative on wastewater treatment systems in the region by stating that, while projected growth will cause a substantial increase in the wastewater that must be treated in the region by 2010, steps are being taken by area sewerage agencies to expand treatment capacity and to maintain compliance with environmental standards.

All of the Sanitation Districts' treatment facilities operate in conformance with all applicable water quality regulations for ocean disposal, riverine discharge, or wastewater reclamation and reuse. The GMP implies that full secondary treatment is the minimum acceptable level of wastewater treatment. However, it should be noted that Section 301(h) of the Clean Water Act does provide a waiver from this requirement under certain circumstances. The Districts have applied for such a waiver and are currently awaiting its outcome.

Page III-4 states the estimated capacity shortfall will be 12 percent, while Page 3-1 states the shortfall will be 19 percent. Please reconcile this difference.

3. The Sanitation Districts believe that the 1974 Areawide Waste Treatment Management Plan (208) should be updated in conjunction with the GMP. What is the current status of the plan update and how will concurrent planning be accomplished?
4. As currently envisioned, the Growth Management Plan relies heavily on voluntary participation by public and local officials who must be "sold" on the GMP through an outreach program. Without accompanying legislative or regulatory action, many jurisdictions may choose not to participate in the GMP, and it may not be prudent for the Districts to utilize the GMP in subsequent planning decisions.
5. It may prove difficult to accomplish the proposal made in the GMP to develop a favorable job/housing mix through the linking of regional and local development to prioritized infrastructure projects. Rather than using infrastructure to achieve the job/housing mix first, it seems more logical to prescribe the job/housing mix first and then properly plan for infrastructure. Regulating by infrastructure funding as suggested in Appendix I could result in new infrastructure consistent with the goals of the GMP, but greatly deficient in real needs if local development proceeds according to its own agenda. Furthermore, SCAG should investigate more thoroughly whether agencies primarily charged with regulating the discharge of pollutants within an area have the authority to carry out urban planning initiatives (e.g., if the Regional Water Quality Control Board can in fact impose a moratorium on sewer connections to improve the job/housing balance in an area -- as proposed on page VIII-5 -- if the sewerage system which serves the area is adequately protecting water quality).

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Cont.

DRAFT ENVIRONMENTAL IMPACT REPORT

Wastewater Treatment

In reviewing the Wastewater Treatment Section (page 6-5), the Districts found the discussion difficult to evaluate due to the general overview approach taken. As indicated earlier, for the information to be of value to the agencies within the SCAG region, the data needs to be disaggregated. The Districts would then be able to determine how much of the estimated 209.1 mgd 2010 shortfall in Los Angeles County is attributable to Districts' facilities. Other points which make this section difficult to evaluate are as follows:

1. The Treatment Plant data is from 1985. By the time the Growth Management Plan is adopted and disaggregated data is available, the information will be five years old. Information regarding the Districts' facilities has changed significantly (see attached table). We can only assume that it has also changed for other facilities as well.
2. The statement (page 6-15) that "Since peak flows exceed average daily flows by as much as 25 percent, plants operating at 75 percent capacity often are considered in need of expansion", is not correct. The capacity of a treatment plant is defined as the average daily flow capacity. For example, the Districts' Joint Water Pollution Control Plant capacity is 385 mgd; however, the design peak capacity is greater than 385 mgd (540 mgd). Treatment plants are designed for peak flow and as in the case of District facilities.
3. Table 6-2 (page 6-16) provides information of limited value and is somewhat misleading. It does not take regional systems into account whereby flows can bypass one plant and be treated at another. Because of this regional approach, some of the WRPs are operated at full capacity by choice and are not necessarily in need of expansion. Thus, the Districts recommend that capacity limitations and shortfalls be evaluated on a system-wide basis. The Districts operate two such systems in addition to three non-regionalized treatment plants. The Districts also recommend a complete list of treatment plants, capacities, current flow rates and proposed expansions might better serve the agencies in evaluating the data in this section. See enclosed table giving pertinent information about the Districts' WRPs.

The Districts were unable to duplicate the 2010 wastewater treatment capacity of 1,122 mgd in Los Angeles County given in the table on the bottom of page 6-20. The Districts would like to obtain the breakdown of the data used to derive this 2010 capacity.

4. The statement (page 6-18) that "three larger districts in Los Angeles and Orange Counties discharge into the Pacific Ocean and do not provide full secondary treatment, the minimum level of treatment required by law" is incorrect. Section 301(h) of the Federal Clean Water Act allows for the discharge of wastewater receiving less than full secondary treatment to the ocean. Related to the statement above is the idea that the shortfall in Los Angeles County would increase if "existing primary treatment capacity is converted to secondary treatment." As mentioned in the DEIR, the City of Los Angeles has agreed to provide full secondary treatment by 1998 without decreasing capacity. The Districts are currently awaiting a decision on a 301 (h) Ocean Discharge Waiver. In the event it is denied, the Districts will be required to expand the secondary treatment facilities to match the primary treatment capacity, and not decrease the overall capacity of the plant.

Solid Waste

1. While the Draft EIR acknowledges (somewhat belatedly on page 6-28) that the Solid Waste analysis does not take into account some of the considerations that influence the waste disposal crisis, including amount of waste disposed of daily at a site, size of disposal area, and disposal limitations specified in operating permits, comments which appear earlier in Chapters 3 and 6 are somewhat misleading. Clearly, there is a need to expand existing landfills, develop new landfills, and implement stronger recycling programs in Los Angeles County as indicated in Table 3-1 and in Chapter 6 under "Mitigation Measures". However, conclusions that "virtually all permitted landfill capacity for residential and commercial waste disposal could be depleted by the end of 1991" is inaccurate. If no expansions, development of new sites, or increased recycling are implemented, Los Angeles County will begin to experience a disposal shortfall by 1992. There would still be disposal capacity available (even through the year 2010), but no adequate daily disposal capability. The amount of disposal shortfall and the point in time at which it occurs is highly variable and dependent on the course of actions taken by various decision-makers in the County. Thus, it is not clear why the year 1996 is cited as the time of capacity depletion.

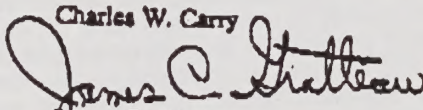
Additionally, it should be noted that lack of public and political support in conjunction with the current energy surplus has made additional implementation of refuse-to-energy unlikely in the near future. While air quality concerns are important factors, as indicated on page 6-25, air emissions control technology is available for meeting regulatory standards.

Lastly, it is not clear what "region" is being referred to in the section entitled "Impacts and Mitigation Measures" on page 6-25, since your disposal demand estimated 19.94 million tons per year (64,000 tpd-6) in 1984 is considerably more than COSWMP's 1985 estimate of 15 million tons per year (48,000 tpd-6). Where possible, the Growth Management Plan should differentiate waste generation regions and components of the waste disposal demand.

The Sanitation Districts hope that these comments will prove helpful to the Southern California Association of Governments in refining the Growth Management Plan and Draft EIR to best serve the needs of the region. If you have questions regarding this response or require additional information, please contact Paul Prestia at extension 2703 or Mark Spademan at extension 2720.

Very truly yours,

Charles W. Carry


James C. Gratteau
Head, Financial Management &
Grants Administration Department

JCG:ln

**LOS ANGELES COUNTY SANITATION DISTRICTS
WASTEWATER TREATMENT FACILITIES**

FACILITY	CURRENT CAPACITY (MGD)		CURRENT AVERAGE FLOW RATE* (MGD)	PROPOSED EXPANSION (PLANNED DATE ON-LINE) (MGD)
	ADWF	PEAK		
<u>Joint Outfall System</u>				
Joint Water Pollution Control Plant	385	540	371	—
Long Beach WRP	25	34	21	—
Los Coyotes WRP	37.5	60	34	—
Pomona WRP	10	14	9	5 (1991)
San Jose Creek WRP	62.5	90	64	37.5 (1991)
Whittier Narrows WRP	15	20	13	—
Regional Total	535	758	512	42.5
<u>Santa Clarita Valley Joint Sewerage System</u>				
Sanguis WRP	5	9	4.6	—
Valencia WRP	7.5	15	6.2	6.0 (1992)
Regional Total	12.5	24	10.8	6.0
<u>Antelope Valley Plants</u>				
Lancaster WRP	6.5	11	6.4	3.5 (1990)
Palmdale WRP	5.5	9.9	4.5	1.5 (1990)

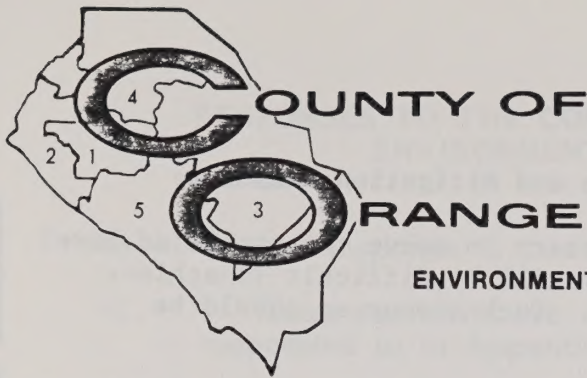
Note: Not shown is La Canada WRP which serves one small community and treats an ADWF of 0.11 mgd

*Annual mean for period 10/87 through 9/88

ADWF = Average Daily Wastewater Flow

RESPONSES TO THE COMMENTS OF THE LOS ANGELES COUNTY
SANITATION DISTRICTS

37. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
38. Since the DEIR is a regional study, it is general in scope and includes limited analysis of subregional impacts. Identification and evaluation of impacts in service districts and jurisdictions within the region should occur in subsequent environmental assessments for proposed land use plans, facility plans, and development projects.
39. Updated information on Los Angeles County treatment plant demand and capacity and proposed facility expansion is cited in the errata to page 6-15 of the DEIR.
40. The statement concerning treatment plant operating capacity has been amended in the errata to page 6-15 of the DEIR.
41. Updated information concerning the operating capacity of regional treatment facilities in general and Los Angeles County in particular is cited in the errata to page 6-15 of the DEIR. Comparable information was not provided for other counties in the region by SCAG or respective wastewater treatment districts.
- The Los Angeles County wastewater treatment capacity estimate shown on page 6-20 of the DEIR was provided by SCAG, based on existing and funded facility capacity as of 1985 (Southern California Association of Governments 1987, page 11-3).
42. Statements concerning compliance with Federal Clean Water Act discharge requirements have been amended in response to this comment, as indicated in the errata to page 6-18 of the DEIR.
43. The statement concerning projected saturation of Los Angeles County landfill capacity has been amended in response to this comment, as indicated in the errata to page 6-25 of the DEIR.
44. The statement concerning the feasibility of producing energy from solid waste has been amended in response to this comment, as indicated in the errata to page 6-25 of the DEIR.
45. The cumulative six-county SCAG region solid waste disposal estimate for 1984 shown on page 6-25 of the DEIR was provided by SCAG, based on a 1985 study by the California Waste Management Board (Southern California Association of Governments 1987, page 12-3).



ERNIE SCHNEIDER
DIRECTOR, EMA

ROBERT G. FISHER
DIRECTOR OF PLANNING

LOCATION:
12 CIVIC CENTER PLAZA
P.O. BOX 4048
SANTA ANA, CA 92702-4048

MAILING ADDRESS:
P.O. BOX 4048
SANTA ANA, CA 92702-4048

TELEPHONE:
(714) 834-4643

Dr. Mark Pisano
Executive Director
SCAG
600 S. Commonwealth Ave, Suite 1000
Los Angeles, CA 90005

NOV 18 1988

FILE

RE: Comments on Growth Management Plan EIR

Dear Dr. Pisano:

We have completed a cursory review of the Growth Management Plan Draft Environmental Impact Report. The comments are provided below. We would like to note that the 30-day timeframe given for the review of this type of document is both unrealistic and unreasonable. Substantial thought and effort went into the preparation of this document which took a lengthy period of time to compile. The jurisdictions which will be implementing this plan need more time to review this type of document since it will be these jurisdictions which will be most affected by the plan that is being proposed. Therefore, the comments provided below are necessarily brief and general in nature.

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COMMENTS:

Page 2-4 Implementation Process: A bullet on this page reads that implementation presupposes the voluntary participation of local jurisdictions in the planning and implementation of the process. It is our opinion that this voluntary participation may be difficult to achieve in the short term, or at least until local jurisdictions can understand the ramifications and implications of the Growth Management Plan on their planning process. Certainly, the 30-day review process does not provide sufficient time to achieve any kind of substantive understanding. This issue and the ability to achieve voluntary participation should be explored at length in the EIR.

Page 2-5 Assessment of Consistency with Targets: Significant incentives must be made available to the private sector to achieve the job/housing balance that's mentioned here as part of the implementation process, especially in the areas of low and moderate income housing. However, such incentives may not be adequate to overcome market forces which are more important in determining the distribution of land uses within jurisdictions. Specific incentives to achieve the job/housing balance should be listed and discussed. One other way of achieving a job/housing balance is by modifying components of local general plans which would re-distribute the existing pattern of land uses in areas that are as yet undeveloped. While such actions may make it possible to achieve job/housing balance, the real factors to achieving this are still governed by market forces and the availability of necessary resources.

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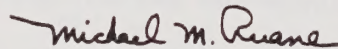


Chapter 3: Summary of Proposed Project Impacts and Mitigation Measures:

1. The required level of public services necessary to serve the projected level of development in the preferred alternative will be difficult to achieve without an infusion of financial resources. Such resources should be identified and discussed in this document.
2. Low-income housing in areas where land values are extremely high is difficult to achieve in the absence of direct government subsidies. This concern should be reviewed and discussed in this document.
3. Negative and positive inducements, including fees to achieve a more desirable job/housing balance should be discussed in greater detail. The concern here is that without a commitment and cooperation from all of the local jurisdictions within the SCAG region, such plans would not achieve the job/housing balance unless there is complete cooperation. Without such cooperation the result may actually be that some jurisdictions may end up with a more favorable tax base and more desirable working and living environment if it does not cooperate with this type of plan.
4. Discussion of growth management programs should also include the use of such programs as a monitoring device for development that has already been approved at the general plan and zoning levels. This would ensure that public facilities are in place in order to serve development as it comes on line.

In conclusion, any growth management plan should recognize that significant incentive or regulatory measures would be required in order to redirect market forces which govern growth and development. In general, this document does not provide adequate discussion of the funding sources and the implementation mechanisms necessary to achieve growth management objectives. We would welcome the opportunity to provide more thorough comments during an extended draft EIR review period.

Very truly yours,



Michael M. Ruane
Interim Director of Planning

JD:no/dsPA-28A/8322
8111706461682

cc: Board Offices
Director, EMA
CAO

NOTE: The County's comments on the Draft Growth Management Plan have been transmitted under separate cover from the County Administrative Office and are incorporated herein by reference.

RESPONSES TO THE COMMENTS OF THE COUNTY OF ORANGE
ENVIRONMENTAL MANAGEMENT AGENCY

46. See Response 1.
47. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
48. It is beyond the scope of the GMP EIR to identify specific financial resources for funding needed public services. Financing considerations will be reviewed as a part of project-specific evaluations.
49. The mitigation measures discussed on page 4-16 of the DEIR recognize the need for government subsidies to finance low-income housing. Financing sources that are mentioned include community development block grant and state housing program funds.
50. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.

NOV 22 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

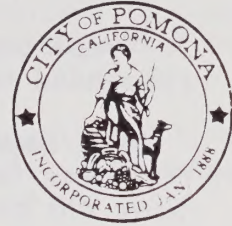
THE CITY OF POMONA

Office of the City Administrator

SANFORD A. SORENSEN
Deputy City Administrator / Development

November 18, 1988

Mr. Paul Hatanaka
Southern California Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, California 90005



RE: DRAFT ENVIRONMENTAL IMPACT REPORT AND GROWTH MANAGEMENT PLAN

Dear Mr. Hatanaka:

Thank you for the opportunity for review SCAG's Growth Management Plan and associated Environmental Impact Report.

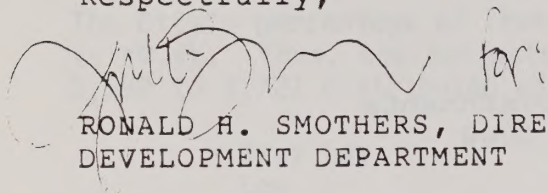
We are encouraged to see SCAG tackle the tough regional planning issues that confront our region. However, we maintain some concerns regarding the draft plan as it may impact the City of Pomona. While we endorse and promote the concept of a jobs/housing balance, we are concerned that the baseline data from which these projections are or will be made are predicated upon incomplete or erroneous information or assumptions about Pomona.

Specifically, we have recently completed a review of the Regional Housing Needs Assessment as it relates to the City of Pomona and found it in need of revision to accurately portray Pomona's development trends and land use capacity. And, since the RHNA projections are, in part, based upon the Growth Management Plan we believe that it too may require revision. The attached letter and supporting information sent to Mr. James A. Minuto, manager for SCAG's Housing Program, is illustrative of this point.

We believe that the trend projections for the East San Gabriel Valley, of which Pomona is a part, may need further review to determine their accuracy. Clearly, we are suggesting that this further review may establish a much more significant reduction in housing growth, augmented by a substantial increase in employment growth in the entire East San Gabriel Valley subregion over the projections made in the GMA4-Mod Job/Housing Balance. This, of course, assumes that other jurisdictions within our subregion may have similar reservations about the trend data.

We look forward to reviewing SCAG's Growth Management Plan as it is further refined. Please contact me should you have any questions regarding this matter.

Respectfully,



RONALD H. SMOTHERS, DIRECTOR
DEVELOPMENT DEPARTMENT

RHS/jt

Attachments

Kodak

THE CITY OF
POMONA

A. J. WILSON
City Administrator

Office of the City Administrator

September 28, 1988



Mr. Jim Minuto
Community and Economic Development
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Dear Mr. Minuto:

This letter is submitted to you in connection with our request to revise the "regional share" of new housing need that has been allocated to the City of Pomona. Over a 6-1/2 year time period, the Regional Housing Needs Assessment (RHNA) has allocated a need to the City of Pomona of almost 3,600 new housing units. Of this total need, the projected need for very low and low income households is 1,453 dwellings. We believe that the needs allocated to the City of Pomona should be revised because of the following factors:

1. The demand for housing experienced during the past decade does not approach the need allocated by SCAG (an average of 550 units per year).
2. The City can be considered a "highly impacted" jurisdiction as defined by SCAG. Our City is a "port of entry" for many low income households. Some of these households are residing in doubled-up conditions or in structures that do not meet housing code standards. Because of these factors, these households probably are not accounted in readily available data on population and income. Thus, our City is more severely impacted than the RHNA has considered to date.
3. Public services and facilities such as schools could be severely impacted if the need for low income housing is physically addressed within the City. This situation could result in serious overcrowding and an economically segregated school system.

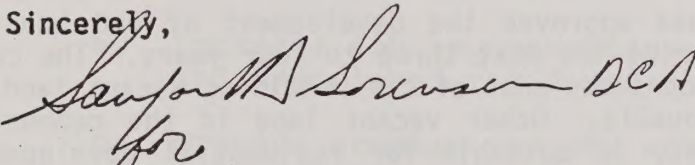
To remain consistent with the balance of the region, the City's share of regional housing need also should account for "latent" or "non-effective" demand. This latter category includes the "very low" and "low" income households. We understand that in the RHNA (page B-28) there is an "avoidance of impaction" adjustment for cities with an income distribution which exceeds the regional average of 40.2% of very low and low income households.

The City's percentage of lower income households, according to the Draft RHNA, is 40.4%. Thus, the estimate of a regional share for Pomona is revised from 3,599 to 2,727 distributed as follows:

Very Low	447	16.4%
Low	655	24.0%
Moderate	597	21.9%
Above Moderate	<u>1,028</u>	<u>37.7%</u>
	2,727	100.0%

If you should have any questions, please give me a call at your convenience.

Sincerely,

 DCA
for

A.J. WILSON
City Administrator

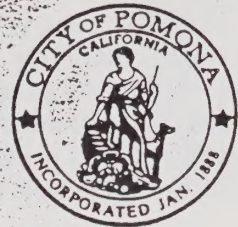
AJW/jjm

THE CITY OF POMONA

A. J. WILSON
City Administrator

Office of the City Administrator

October 21, 1988



Mr. James A. Minuto, Manager
SCAG Housing Manager
So. Calif. Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, CA. 90005

RE: Growth Constraints that Inhibit Development

Dear Mr. Minuto:

We have received your letter acknowledging the City's request to revise the Regional Housing Needs Assessment figures for Pomona. Thank you for the opportunity to submit supplemental information on the constraints which inhibit the potential for new construction in Pomona.

At the present time, the City has approved the development of 800 housing units which are to be absorbed during the next three to four years. The construction of these housing units consumes most of the remaining vacant land in the City which is readily developable. Other vacant land in the community which, from a location standpoint, is suitable for residential development also is situated within neighborhood environments that need improvements in order to attract private investors to build new housing.

Some of the improvements are of a public nature such as landscaping, block walls and curbs, gutters and sidewalks. In order to attract developers, other incentives or methods must be devised to facilitate new development. These incentives or methods are required in order to assemble lots and clear land, for example. This process, whether by private investors or redevelopment, usually takes a considerable amount of time.

We do not foresee the rate of recycling, even with substantial public investment, to exceed the 200 to 300 units per year level which has been experienced during the recent years. Because of all the foregoing, we would anticipate a realistic "share of regional housing need" for effective demand to be 1,625 dwelling units over a 6.5 year period (250 DUs per year x 6.5 years).

As noted by SCAG in the Draft Regional Housing Needs Assessment, there is a difference between "effective" and "latent" demand. According to this report:

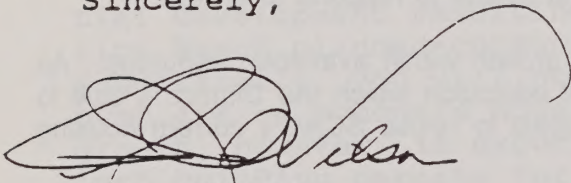
"Identification of Future Need for the higher income levels gives each jurisdiction an estimate of effective demand, or how much demand for housing there will be in the locality as a function of market forces. Future Need at the lower income levels is often largely latent demand, since such income levels, without subsidy or other assistance are often ineffective in causing housing to be supplied." (emphasis added)

The City of Pomona is currently in the midst of amending its twelve-year old General Plan. At this time, our efforts are focused upon amendments to the Land Use Element and the creation of a new Housing Element. This process has been guided to this point by several broad goals which I have included here to provide you with an overview of the context of this amendment process.

1. Eliminate overcrowding of schools and neighborhoods.
2. Encourage the recycling of older dilapidated rural housing into livable suburban housing.
3. Remove and prevent traffic/land use intrusions into residential neighborhoods.
4. Develop neighborhood stabilization and rehabilitation programs to increase the environmental quality of the City's residential neighborhoods.
5. Develop programs and land use strategies that capture the leakage of spendable income that presently leaves the City.
6. Balance the City's industrial sector by attracting clean, high tech industries.
7. Stimulate a healthy economy in order to:
 - a. Increase job opportunities, especially for under employed and unemployed residents;
 - b. Provide greater variety and convenience in all types of development; and
 - c. Strengthen the sales tax base of the City.

We appreciate the opportunity to comment on the RHNA and look forward to working with you during the next two months.

Sincerely,



A.J. WILSON
City Administrator



Pomona Unified School District

800 South Garey Avenue, P. O. Box 2900, Pomona, CA 91769 - (714) 623-5251

November 17, 1988

Konradt Bartlam, Senior Planner
City of Pomona
Community Development Department
City Hall, 505 South Garey Avenue
Box 660, Pomona, CA 91769

Dear Mr. Bartlam:

The District's current enrollment exceeds 25,000 and is currently growing at approximately 4% each year. District schools are overcrowded. Overall enrollment capacities were exceeded in 1984. Since that time the equivalent of four elementary schools have been installed on existing campuses using temporary classroom buildings. Over 27% of the District's classrooms are temporary. The capacity of most elementary schools to absorb further growth without expansion of permanent core facilities has been exceeded.

The District has recently received State approval for the advanced planning of four new elementary schools and one high school; however, this is based upon projections of current enrollment growth rates. Over 1,000 additional students must be permanently housed on existing campuses before any new schools will be occupied. Income from school developer fees is not sufficient to accommodate these additional students while meeting State matching-fund requirements. In addition, no funding is available to adequately house State mandated special education programs, or to complete State mandated replacement of temporary buildings not conforming to earthquake and/or handicap access standards.

The SCAG planning numbers for new housing development within the City of Pomona reflect an increase in the growth rate. Ironically, based on surveys of available properties and current zoning densities the majority of this accelerated growth would take place in the most overcrowded areas; in the areas where the District is most unable to respond to growth.

The District is unable to respond to the current rate of growth within available resources. An acceleration in growth will severely impact the quality of education which the District is able to provide. The District supports the City of Pomona's appeal to revise SCAG's current housing development planning numbers.

Sincerely,

Richard L. Donoghue
Assistant Superintendent
Business Services

RLD:LLG:dm

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NOV 17 1988

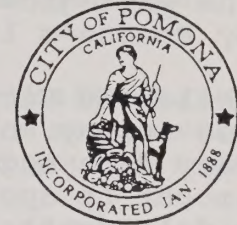
COMMUNITY DEVELOPMENT
— PLANNING DIVISION —

THE CITY OF POMONA

SANFORD A. SORENSEN
Director

Community Development Department

November 17, 1988



Mr. James A. Minuto, Manager
SCAG Housing Program
Southern California Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, California 90005

RE: REQUEST FOR REVISION TO THE REGIONAL HOUSING NEEDS ASSESSMENT

Dear Mr. Minuto:

This letter is a clarification of and a follow-up to our October 21, 1988 correspondence which presented various factors for the RHNA SUBCOMMITTEE'S consideration with respect to a revision for Pomona's future housing needs assessment.

We have received the staff recommendation regarding our request for this revision and want to clarify certain factors upon which our request is made. That recommendation intimates that "public improvements" is the sole constraint which lies behind the City's "appeal". Rather, we wholeheartedly agree with your statement in the staff recommendation that "availability of sites...is the determining factor here." And, we maintain that our original request is consistent with this finding as it relates to the availability of sites.

Attached you will find a table that illustrates the housing development trend in Pomona over the last eight years (Table 1). This table also illustrates the significant "bulge" in residential development resulting from the near-completion of the Phillips Ranch planned-community in Pomona during this same period. Specifically, you will note that Phillips Ranch has accounted for over 45% of Pomona's housing growth during this decade. This growth, however, is expected to eclipse during late 1989 as the last building permits for the "build-out" of Phillips Ranch occur. This build-out is simply a function of the supply of vacant land. We believe, therefore, that these "bulge" figures should be extracted from any trend projections because Phillips Ranch has resulted from deliberate although artificial City programs (i.e., redevelopment, mortgage revenue bonds, CDBG, etc.) to encourage provision for local and regional housing needs.

In excluding this "bulge" of residential growth, we firmly believe that growth trends indicate that our housing stock will be augmented by up to 300 dwelling units each year for the ensuing five-year RHNA period. This growth factor is borne out by

the past growth trends (see Table 1) and is further substantiated by Pomona's limited availability of suitable sites.

While the City is nearing completion of a parcel-specific land-use survey that will quantify all vacant land in Pomona, preliminary data suggests that the total area of all vacant land will amount to approximately 588 gross acres. This vacant land is widely scattered throughout the community and even includes those areas currently zoned (and better suited) to commercial or industrial development. Assuming this total area were developed exclusively for residential uses, and that those uses followed past residential patterns, the net increase would total 5622 dwelling units (see Table 2). The obvious flaw in this methodology is that not all of this vacant land will be set aside for residential development. Further, this methodology does not begin to address a future scenario where, in 1994 for instance, Pomona has little or no vacant land to satisfy all of its local and regional land use demands into the next century.

Another significant constraint which deserves consideration pertains to overcrowding in Pomona's public schools. At present, the Pomona Unified School District indicates that the community has a facilities deficit of 4 elementary and 1 high school to meet current enrollment demand. Until funding is made available to construct additional public schools, every additional dwelling unit adds to the severe overcrowding that pervades Pomona's public schools. And, even with unlimited funding opportunities from the State, it is unlikely that existing overcrowding conditions could be mitigated within the five-year RHNA period. It should be noted, however, that as this overcrowding is mitigated, the vacant land supply will be further depleted (the Pomona Unified School District estimates that between 80 and 100 acres of land will be necessary to accommodate the existing need for public schools).

Based upon our request for a revision to the RHNA allocation as outlined on October 21, 1988, and further described in this letter and accompanying information, we believe that Pomona's allocation should not exceed our previous estimate, distributed in numbers of dwelling units as follows:

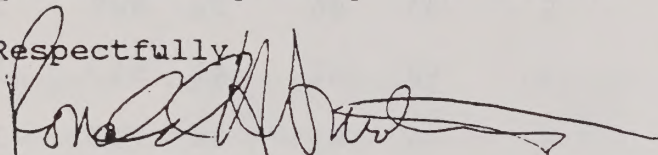
Very Low	447	16.4%
Low	655	24.0%
Moderate	597	21.9%
Above Moderate	<u>1028</u>	<u>37.7%</u>
	2727	100.0%

Please note that while our requested revision represents a reduction in Pomona's housing allocation, we feel that it still is an

aggressive "target" for the City to satisfy based upon the serious constraints we have detailed.

We appreciate the opportunity to comment upon Pomona's share of the RHNA and provide input as it is refined into a more useful regional planning tool. Please contact me should you have any questions regarding this matter.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Ronald H. Smothers', with a long, sweeping horizontal line extending to the right.

RONALD H. SMOTHERS, DIRECTOR
DEVELOPMENT DEPARTMENT

RHS/jt

Attachments

Table 1

RESIDENTIAL DEVELOPMENT ACTIVITY AS EXPRESSED IN BUILDING
PERMITS BY TYPE AND YEAR

Year	Single Family	Phillips Ranch	Duplex	Other	M. 3-4	Family 5+	Demo	Total	Total w/o PR
1980	28	424	13	1	102	25	28	593	169
1981	9	412	24	5	93	66	32	609	197
1982	29	206	24	3	98	152	41	512	347
1983	102	375	4	9	36	191	34	717	342
1984	110	196	21	6	76	42	38	451	255
1985	102	133	30	1	39	200	41	505	372
1986	102	97	8	1	44	567	48	819	722
1987	45	551	18	2	34	306	61	956	405
1988*	63	130	4	1	89	95	48	382	252
Total	590	2524	146	29	611	1644	371	5544	3061
YEARLY MEAN =									616 340

Note: Single Family: d.u. built outside of Phillips Ranch
 Phillips Ranch: d.u. built inside of Phillips Ranch
 Other: Dwlgs. Gained by move in or conversion

Source: City of Pomona Building Division Monthly Statistical
 Reports, 1980 through 1988

* Through October 1988

Table 2

THE TOTAL VACANT LAND AS EXPRESSED
IN FUTURE HOUSING NEEDS CAPACITY**

TYPE	PERCENT TOTAL STOCK	TOTAL (1988)	VACANT LAND	D.U. DENSITY/ ACRE	TOTAL DWELLING UNITS
SINGLE FAMILY	68.0		400.0 ac.	6/ACRE	2,400
LOW DENSITY	22.2		130.5 ac.	15/ACRE	1,957
MEDIUM DENSITY	9.8		57.5 ac.	22/ACRE	1,276
TOTAL	100.0		588.0 ac.		5,622

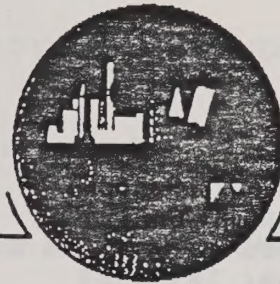
Source: Land Use Survey, City of Pomona Development Dept/
Castaneda Associates, November 1988

** This constitutes all vacant land in the City of
Pomona irrespective of location and adjacent uses

RESPONSES TO THE COMMENTS OF THE CITY OF POMONA

51. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
52. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

City of Redlands



November 18, 1988

CI

NOV 18 1988

Mr. Paul Hatanaka
Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS

Dear Mr. Hatanaka:

Thank you for accepting our comments on the Regional Growth Management Plan (DEIR). Our comments relate to the Regional Housing Needs Assessment component of the plan:

1. SCAG's methodology to determine regional and sub-regional projected housing need is inherently flawed because it is based on historical data biased with intra-regional transfers of demand. SCAG's method of determining future housing need relied on definitions which confuse housing need with housing demand. Those terms are undefined in Government Code Section 65584(a), which required that, "The distribution of regional housing needs shall....take into consideration market demand for housing..." The City of Redlands maintains that much of the Redlands housing need identified by SCAG based on historical trends is, in reality, the housing need of Orange and L.A. Counties transferred to Redlands because of the failure of those job-rich sub-regions to supply sufficient quantities of reasonable housing. Only a portion of the SCAG identified Redlands housing need will be actually generated in Redlands or its sub-region.

53

Do L.A. and Orange counties get credit for meeting future housing demand because they have historically transferred much of that demand to other sub-regions? By relying on historical trends to forecast future sub-regional needs, SCAG is acquiescing to the circularity that it professes to avoid. The concept of public welfare cannot be stretched to require cities to accept responsibility to meet housing demand that exists only because it has gone unmet within other sub-regions.

54

Page two

Mr. Paul Hatanaka

Southern California Association of Governments

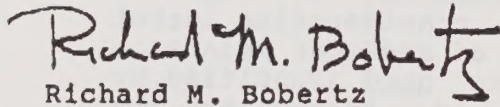
November 18, 1988

2. SCAG's future housing need projections are inconsistent with the Growth Management Plan goal of achieving a jobs/housing balance. SCAG methodology depends on continuing existing trends modified to approach a regional jobs/housing balance over a 100 year time span. (p. 2-10) There is no justification in the DEIR for setting the time span at such a long increment. In effect, cities that are able to approach JHB at a faster rate may be penalized for not being consistent with the RNHA numbers.

Your response to our comments will be appreciated. The general tone of the report which emphasises the necessity to break the current cycle and overcome the "business as usual" syndrome to achieve improvement in air quality and traffic congestion is applauded by the City of Redlands.

Sincerely,

Jeffrey L. Shaw, Director
Community Development Department



Richard M. Bobertz
Senior Planner

RMB:ep

RESPONSES TO THE COMMENTS OF THE CITY OF REDLANDS

53. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
54. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
55. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

MAYOR
Dan Young
VICE MAYOR
Patricia A. McGuigan
COUNCILMEMBERS
John Acosta
Daniel E. Griset
Wilson B. Hart
Ron May
Miguel A. Pulido



Paul Matanaka

CITY OF SANTA ANA

ALL-AMERICA CITY 1982-83

CITY MANAGER
David N. Ream
CITY ATTORNEY
Edward J. Cooper
CLERK OF THE COUNCIL
Janice C. Guy

November 18, 1988

Ms. Barbara Sullivan
Principal Planner
SCAG
600 S. Commonwealth Ave., Ste. 1000
Los Angeles, CA 90005

RE: COMMENTS ON THE OCTOBER 1988 DRAFT GROWTH MANAGEMENT
PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Sullivan:

Our review of the draft Growth Management Plan (GMP) and the draft Environmental Impact Report indicate that both documents raise the same issues and concerns. Therefore, the comments in this letter represent the City's response to both. City staff has done a necessarily cursory analysis of the GMP due to the short review period allowed by SCAG. It is our understanding that additional comments can be made at the December 15 public hearing prior to adoption of the plan.

The City of Santa Ana supports a regional approach to growth management and the need for coordination of land use goals and policies beyond local boundaries. The draft GMP indicates a growth management policy with a jobs/housing balance as the primary strategy, but implementation of this strategy involves many proposals that the City cannot support based upon the information contained in the plan.

Because of its size and location, Santa Ana is an urban center that has significant regional influence. It is the tenth largest City in the state, the fourth largest in the SCAG region and it contains 18 percent of Orange County's population, 16 percent of its housing and 23 percent of its jobs. It has a sizeable low-income and minority population. Santa Ana has recently been revitalized due to an extensive infusion of tax dollars and redevelopment efforts aimed at upgrading its economic vitality. Strict implementation of the measures proposed in this plan would erode the gains made in

November 18, 1988

this City and have a substantial impact on the County as well. As the County seat and one of its oldest cities, Santa Ana hopes to continue its revitalization and has already begun to implement many of the proposals recommended in the GMP.

Conceptually, we support the following proposals of the GMP.

- Regional planning coordination with local (subregional) agencies and SCAG.
- Regulatory strategies that allow a mixture of land uses and intensity regulations that would reduce travel demands.
- Legislative enabling acts to allow various alternative financial strategies such as interjurisdictional tax sharing and deferred taxation of undeveloped property.
- Strategies that address growth management at the local and regional level through the utilization of existing planning agencies.

56
Cont.

The following areas require additional clarification, impact assessment and regional consensus prior to being considered for adoption and local implementation.

- Authority for local land use decisions being made by regional or state agencies as proposed by South Coast Air Quality Management District for Indirect Source and New Source Review as a mechanism to force local compliance with GMP provisions.
- Implementation of the jobs/housing balance strategy with out any fiscal impact analysis by SCAG to determine local impacts.
- Implementation of the GMP using the proposed jobs/housing figures. This is a formula for failure because there is no disaggregation of the data down to the local level where it is to be implemented.
- The jobs/housing strategy goals are imprecise and therefore do not lend themselves to monitoring for successful implementation at the local level.

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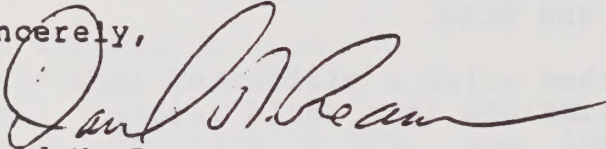
Enclosed are additional comments that have been prepared by City staff. Please accept them as part of our official response to the draft Growth Management Plan and the draft Environmental Impact Report. Comments on the Regional Mobility Plan are being provided under separate cover.

Ms. Barbara Sullivan
Page 3
November 18, 1988

We applaud your efforts in establishing a coordinated regional approach to one of Southern California's major issues. If you have any questions regarding Santa Ana's comments, please contact Jill Wallace of my office at (714) 647-6900.

We look forward to working with SCAG to develop a locally sensitive plan for growth management.

Sincerely,



David N. Ream
City Manager

sl

cc: Mayor and City Council
Paul N. Hatanaka

MEMORANDUM

David N. Ream

City Manager



Date: November 16, 1988

To: June Catalano, Exec. Dir.

From: Planning and Building Agency

Subject: COMMENTS ON SCAG OCTOBER 1988 DRAFT GROWTH MANAGEMENT PLAN AND DRAFT EIR

The Draft Growth Management Plan (GMP) and the Draft Environmental Impact Report (DEIR) have been prepared by the Southern California Association of Governments and distributed for comments from local governments and affected agencies. Written comments on both documents must be submitted by November 18, 1988 in order to be included as a part of the public record. While they are not obligated to respond to comments received after this date, comments may be submitted up until December 15, 1988 when SCAG is scheduled to adopt the plan.

STAFF COMMENTS

Staff supports SCAG's growth management efforts and the need for coordinated and balanced management of land use goals and policies on a regional basis. Implementation of a growth management policy incorporating as its primary strategy a job/housing balance as outlined in the Growth Management Plan, however, raises a host of issues and concerns. The comments which follow indicate the areas of the plan that the City supports as well as those that we cannot support based upon the information presented in the plan.

The aspects of the plan that the City of Santa Ana supports are:

- o That investment strategies that realize objectives for downtown revitalization, housing subsidies, investment programs and employment/enhancement hiring programs be promoted.
- o That financial strategies such as deferred taxation on undeveloped land, revenue increment financing and interjurisdictional tax sharing be quickly pursued in the appropriate legislative channels.
- o That regulatory strategies such as mixing land uses and developing zoning and intensity regulations be utilized to reduce transportation demands.
- o That planning strategies for growth management be addressed at the regional as well as the local level through increased utilization of existing planning systems and cooperation among various planning agencies that adopt regional growth guidelines.

Staff was unable to provide a detailed analysis of the growth management plan and its Draft EIR in the short review time provided. As such, many questions were raised regarding the methodology and policy criteria that are not addressed satisfactorily by the plan. Based on our review the following concerns should be further clarified in the plan:

CONCERNS

1. Implementation of the Growth Management Plan and strategies to achieve a job housing balance can lead to a usurpation of local planning authority:

The Regional Growth Management Plan has, as its primary strategy the achievement of a job/housing balance throughout the region. This strategy was devised to lower trip generation thereby lessening transportation demand and consequently lessening potential pollution by locating jobs and housing in closer proximity.

The plan requires that local agencies pursue policy goals and redirect current regulations and create incentives to establish a better balance of jobs and housing. At issue are the various measures that are recommended to achieve jobs/housing balance targets. These measures include:

- A. Adoption of a regional planning element into local general plans.

Although adoption of a regional growth management element would have no direct legal impacts, state planning law requires that general plans remain internally consistent. Policies promoted in this element must be consistent or compatible with objectives, general land uses and programs specified in the plan. Adoption of a regional plan that is in conflict with goals and policies promoted at the local level could subordinate the local general plan to the goals of the regional element.

- B. Local government and regional agency differences would be resolved by a third party.

Conflicts that arise between local governments and regional agencies concerning development of jobs and housing targets would be resolved by a third party. This would likely require a new agency and could hurt the promotion of economic development by adding a new level of bureaucracy and time delays to process discretionary or administrative actions.

- C. Changes in redevelopment laws to require consistency between future redevelopment activities and a regional jobs/housing balance.

This strategy would specifically prohibit redevelopment activities in job rich subregions that would contribute to employment (jobs) increases above a target level. This has major implications for Santa Ana which is job rich and has a very active economic redevelopment strategy.

62
Cont.

- D. Changes in environmental regulations to support a job/housing balance.

The regulatory powers employed by Environmental agencies such as SCAQMD and environmental laws such as CEQA could be used to limit commercial development in job rich areas.

2. No fiscal impact analysis has been conducted to determine the cost/benefit to cities or regions that will implement the growth management plan.

- A. Job rich areas may be discouraged from attracting economic activity that would increase its employment base. This strategy could have an adverse economic effect on cities or regions that need unrestrained economic development to enhance their tax base. This is especially true of older urban core cities whose aging infrastructure requires increased maintenance. The majority of the capital improvements budget for this maintenance comes from tax revenues on commercial/industrial projects.

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- B. Revenue increment financing and interjurisdictional tax sharing strategies need to be implemented immediately and on a long term basis. The presumption that "job rich" areas are "tax rich" areas is misleading. Densely populated urban core cities such as Santa Ana which are job rich are not necessarily tax rich as they must meet financial obligations that are a result of increased public services brought on by high densities of population. It is necessary to offset the high cost of dense urban development by pursuing a vigorous economic base. Restrictions on a city's or region's ability to develop and maintain this base have socio-economic implications such as the loss of funding for needed physical and social infrastructure. The adverse impacts can be

mitigated through a tax-sharing agreement, however, no comprehensive legislative effort has been noted in the plan, although the housing/jobs balance objective has been implemented through the Regional Housing Needs Assessment (RHNA) which cities must incorporate into their housing elements. Cities cannot support increased housing densities without the economic base to pay for required physical and social infrastructure to support the increased population.

3. Inadequate disaggregation of the jobs/housing balance targets proposed make implementation and monitoring vague and imprecise.

Monitoring of the jobs/housing balance target goals are to be conducted over a 5 year period (TIER 1). A subsequent review of the adequacy of programs, implementation measures and goals would be undertaken in TIER II. Staff has major concerns over the monitoring and implementation methodology. How are goals measured? Who measures them? How are they disaggregated to the local level? Where they are implemented?

The issue of subregions and definition of subregions has not been addressed in the plan. It is not clear if the participating agencies, cities and regions have input into the numerical sums that form the housing/job balance target goals.

SCAG has admitted to differences in the statistical methodology use to derive these goals. At issue is an inconsistency in statistical methodology that can insure a consistent, fair and equitable division of housing and job allocations. This must be further addressed in more technical appendices. In addition only one set of statistics (from a sample source) should be used for source documentation. This source should be adopted by SCAG, ratified by its members and be the preferred projections and statistics for the Growth Management Plan.

4. As a strategy is the jobs/housing balance attainable and will it have the desired effects?

There have been many questions raised concerning the jobs/housing strategy. If these issues cannot be addressed in a timely manner, support for the strategy will erode. The main premise of the success or failure of the Growth Management Plan is to move employment closer to housing and vice-versa. Many secondary and tertiary impacts have failed to be explained or analyzed in the Growth Management Plan. Among these are:

- A. A preference for detached single family homes over attached homes. The availability of a higher intensity housing unit at a lower cost would not deter those who chose to live in areas that are far removed from their employment centers because of housing style preference.
- b. Encouraging the relocation of economic activity to job poor areas to achieve lower travel demands may not be achieved if the economic activity is market specific (i.e., it depends upon location that is close to its primary market). Gains achieved in reducing traffic generation by moving jobs closer to housing would be negated if the goods and services had to be transported back to the market areas.
- c. On a regional scale, spatial foundations of urbanism are sometimes predicated on a central place theory (i.e., those goods and services are located in a specific region to service the existing population). Artificially altering this free market theory may not be attainable as its success depends upon substantial government intervention in lifestyles and predisposed travel patterns.
- d. Attainment of Growth Management Plan goals would entail a substantial amount of legislative effort at the regional and state level. Redirecting policies to create enabling legislation are key to the success of this plan. The dramatic short term changes the plan proposes preclude the adoption of changes needed at the legislative level. This could mean that implementation policies for the Growth Management Plan dealing with legislative changes might not be effective in the first five years of the plan and consequently should be given less weight in developing a clear growth management strategy.
- e. The lack of available land to implement five year housing targets as proposed in the RHNA. As an urban core city, Santa Ana is predicted to reach full first level buildout in the next 10-15 years. Available land for housing will come through recycling efforts of aged housing stock and reclassification of existing industrial/commercial uses to residential. The availability of land to develop the type of residential units sought often in the market place is severely limited (single family detached). As such efforts to achieve the targets for housing forecasted in the Regional Housing Need Assessment can be expected to fall short. This will be compounded to the extent that other built-out cities have the same constraints.

65
Cont

David N. Ream
November 16, 1988
Page 6

In conclusion, we would like to acknowledge the positive impacts likely to result from implementation of the GMP such as incentives for housing construction and rehabilitation, the development of regional planning goals, and an increase in the efficiency of existing transportation systems. However, in order for the plan to be successful in its goal of balancing jobs and housing in order to achieve the desired environmental and social benefits, there must be active participation and consensus among the local governments that will implement the plan.

RESPONSES TO THE COMMENTS OF THE CITY OF SANTA ANA

56. Comment noted. See Responses 57 through 65.
57. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
58. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report. Fiscal impact analysis is not required by CEQA.
59. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
60. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
61. Comment noted.
62. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
63. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report. See also Response 58.
64. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
65. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.



South Coast
AIR QUALITY MANAGEMENT DISTRICT

9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

November 18, 1988

Mr. Paul Hatanaka
Principal Planner
Southern California Association of Governments
600 S. Commonwealth Ave. Suite 1000
Los Angeles, CA 90005

Dear Mr. Hatanaka:

DRAFT ENVIRONMENTAL IMPACT REPORT ON THE SOUTHERN
CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT
GROWTH MANAGEMENT PLAN
SCAQMD# A81024C
SCH # 88062924

DRAFT ENVIRONMENTAL IMPACT REPORT ON THE SOUTHERN
CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT
REGIONAL MOBILITY PLAN
SCAQMD # A82024C
SCH # 87-121613

The Planning Division has reviewed the above documents and
has the following comments:

GROWTH MANAGEMENT PLAN EIR:

AIR QUALITY

Both the 1982 AQMP and the Draft 1988 AQMP are used as separate criteria for judging the consistency of the GMP with the AQMP. The use of these dual consistency criteria is confusing and unnecessary. Reliance solely on the Draft 1988 AQMP is preferred, because: a) it is based on a more recent (1985) emissions inventory, b) it incorporates six more years' experience in the modeling and control of air pollution, c) it is a companion document to the Draft 1988 Growth Management Plan, and d) the 1982 AQMP has been invalidated in court.

Furthermore, the criteria levels in the 1982 AQMP are for the year 2000, not the year 2010, and are substantially above those of (they allow higher emissions than) the 1988 AQMP (with the exception of CO). Use of only the "target emission levels", i.e., emission levels which will just meet the federal standards, derived from the 1988 AQMP, would clarify the discussion of AQMP consistency of the proposed project and its alternatives considerably.

However, the "target emission levels" reported in the GMP DEIR are not consistent with the emission levels reported in the AQMP:

- o For ROG, the AQMP reports 200 tons/day, while the GMP DEIR uses 188 tons/day.

- o For CO, the linear interpolation used in the GMP DEIR to calculate the target emission level relies on a year 2010 emission value of 1890 tons/day, while the AQMP reports 1941 tons/day.

- o For NOx, the AQMP reports 242 tons/day, while the GMP DEIR uses 210 tons/day.

- o For SOx, the AQMP reports 30 tons/day, while the GMP DEIR uses 47 tons/day.

- o For PM10, the AQMP reports 1361 tons/day, while the GMP DEIR uses 603 tons/day.

Emission levels from the 1988 AQMP should be used. If not, justification for this divergence should be provided.

On p. 8-33 the following statement appears: "...it is unlikely that implementing these measures could result in ROG, NOx, or SOx emissions at or below the target levels." Since it is unclear from the context whether the measures referred to are those in the 1988 AQMP, the 1982 AQMP, or some other source, the implication of this statement is unclear. A more specific statement is needed.

ENERGY

The discussion in this section is out of date by about eight years. Data cited to characterize the energy setting of the Basin is generally from the late 1970's and early 1980's. The issues discussed are not current issues in energy planning. Furthermore, the section makes no mention of the AQMP's electrification strategy for the industrial sector, nor does it integrate AQMP measures for clean vehicle fuels into its projections. Specific comments are detailed below:

Electricity

1. Oil is not "the predominant fuel used in generating electricity" in the Basin. This statement was true a decade ago, but efforts by the Basin's utilities to convert oil-fired power plants to natural gas and to add coal and nuclear capacity have reduced their dependence on oil-fired generation to a minimal amount. Currently, oil is used only as a last resort, when natural gas is not available, or when oil-fired capacity is the last available capacity to meet

peak demand. The conclusion that "regional (electric) supply is highly sensitive to changes in oil prices and to potential disruption in oil supplies" is no longer true.

With regard to gas-fired electricity generation, the "highly variable" availability of natural gas has not been characteristic of the last ten years. Only in the unusually cold winter of 1987-88 were natural gas supplies to utilities curtailed. The subsequent coordinated effort by local government, the PUC, and utilities has established a plan for making such curtailments less likely in the future.

2. A more current and more representative profile of the types of electric generation resources should be provided. For example, no mention is made of the significant role of coal and nuclear plants in the current supply mix. The EIR focuses on energy, as opposed to capacity aspects and provides insufficient discussion of current generating capacity and future capacity needs.

3. The role of several of the Basin's electric utilities is ignored. These include the municipal electric utilities of the cities of Anaheim, Riverside, Colton, and others. While these utilities purchase most of their power in bulk from Southern California Edison, some of them have become part owners of generation resources themselves and are engaged in significant purchases of power on the open market from both in-Basin and out-of-Basin generating plants.

4. The contribution of independent power producers, most importantly cogenerators, to energy and capacity supply should be discussed. Since these producers are being relied upon increasingly to meet future supply needs, recognition of their role is critical.

5. Better documentation for statements than personal communications is available and should be used. Examples are Basin utilities' 1987 annual reports, the CEC's Biennial Report, and the CEC's Electricity report.

Natural Gas

1. The data cited for out-of-state natural gas supply are out of date (1976-79). The natural gas demand data is also out of date (1980). The 1988 Gas Report (Southern California Utilities, 1988) contains 1987 data.

Transportation Energy

1. Although it is noted that "fuel economy of new vehicles has increased in recent years", no quantification of this important trend is given.

2. The data on fuel economy and gasoline consumption are out of date (1979).

77

Impacts

1. The beginning date for projections of energy demand and supply should be more recent than 1980. Data for 1987 are available directly from utilities and from the CEC.

78

2. What is the support for the statement that the utilities are expected to increase their reliance on nuclear power (p. 6-60)? No new nuclear power plants have been ordered by utilities for at least a decade, and scores of plants have been cancelled. The statement appears to be out of date. The long time frame (ten to fifteen years) needed in order to bring a nuclear plant on line suggests that nuclear power would not soon be able to provide a significant increase in Basin electricity supply. Although recent concerns with the atmospheric CO₂ buildup have revived the consideration of nuclear power as a future supply option, this discussion is just beginning and has yet to result in new nuclear plant orders.

79

3. In order to demonstrate the increasing contribution of alternative and renewable electricity sources, the generating capacity and energy provided by these in 1987 should be reported, as should the capacity and energy projected from them in 2010.

80

4. On p. 6-60, the SCE and LADWP peak demands are reversed.

81

5. What are the implications for system reliability of a peak demand which is 95% of capacity? (p 6-60)

82

Mitigation Measures

1. The effect on energy demand and supply of the AQMP's Tier III electrification strategy is not considered, either in baseline projections or as a mitigation measure. Electricity consumption would increase dramatically if the strategy's measures for industrial and transportation electrification were followed.

83

2. Promotion of cogeneration as an energy impact mitigation measure is inconsistent with the AQMP's phasing out of in-Basin combustion processes.

84

3. Alternative and renewable energy sources are generally more capital-intensive than conventional energy sources, not less, as is stated on p. 6-61.

85

4. A 20% reduction in the region's electricity demand would equal 23,520 GWh/yr (20% x 117,600 GWh/yr), not 22,600 GWh/yr as reported. A 15% reduction in natural gas use

86

would equal 140.25 bcf/yr (15% x 935 bcf/yr), not 111.62 bcf/yr as reported (p. 6-61).

IRREVERSIBLE ENVIRONMENTAL CHANGES

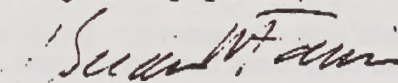
This section should be expanded to include impacts in addition to open space and construction resources. Growth on the scale envisioned would have impacts on natural habitats and endangered species, among others.

REGIONAL MOBILITY PLAN EIR:

1. Discussion of transportation energy use mitigation should include other clean fuels, such as compressed natural gas and liquefied petroleum gas.
2. The AQMP vehicle electrification requirements have been revised downward. Please see the forthcoming AQMP Final EIR for these revisions.
3. What is the source for the target dates of 1998 for 40% electrification/methanol fueling of passenger and 70% methanol fueling of heavy duty vehicles? Do these figures refer to new vehicles or to the entire vehicle stock?
3. Table 21, page 140, should have a column for accessibility in the year 2010 with no project.
4. The legend in Figure 11, page 50, needs additional explanation.

If you have any questions about the above comments, please call Robert Kneisel at (818) 572-2150.

Very truly yours,



Brian W. Farris,
Senior Air Quality Specialist
Energy and Environment Section

RESPONSES TO THE COMMENTS OF THE SOUTH COAST
AIR QUALITY MANAGEMENT DISTRICT

66. Refer to Response 80.

67. For ROG, 200 tons per day is the episode-based value identified in the September 1988 Draft AQMP (AQMP); 188 tons per day is the average daily value calculated from the 2010 baseline emissions estimated (identified on page 2-4 of the September 1988 AQMP Draft EIR [AQMP DEIR]) and the ROG emissions reduction estimate (identified on page 2-13 of the AQMP DEIR). The conclusions in the GMP EIR would not change given this different threshold.

For CO, the AQMP reports 1941 tons per day, whereas the AQMP DEIR reports 1890 tons per day on page 4-1-16. The conclusions in the GMP EIR would not change given this different threshold.

For NO_x, the AQMP reports 242 tons per day, whereas the AQMP DEIR reports 210 tons per day based on the reported 2010 baseline emissions estimate (identified on page 2-4 of the AQMP DEIR) and NO_x emissions reduction estimate (identified on page 2-13 of the AQMP DEIR). The conclusions in the GMP EIR would not change given this different threshold.

For SO_x, the AQMP reports that only Tiers I and II would need to be implemented to attain federal PM₁₀ standards. The estimate of 47 tons per day is therefore based on Tiers I and II. The estimate of 30 tons per day is based on implementation of Tiers I, II, and III.

The GMP EIR uses 603 tons per day of PM₁₀. The estimate of 1361 tons per day relates to total suspended particulates (TSP). The GMP EIR uses PM₁₀ rather than TSP since PM₁₀ more accurately reflects health impacts.

68. See the errata to pages 8-32 and 8-33.

69. Information cited in the "Energy" section has been updated and amended as indicated below in the responses to the SCAQMD's comments.

70. Updated information concerning the use of oil and natural gas in electricity generation is cited in the errata to page 6-58 of the DEIR.

71. Updated information concerning electricity generation resources is cited in the errata to page 6-56 of the DEIR.

72. The role of independent power producers is cited in the errata to page 6-56 of the DEIR.

73. The role of independent power producers is cited in the errata to page 6-58 of the DEIR.

74. Information from the California Energy Commission's (CEC) 1987 Biennial Report (California Energy Commission 1987a) is cited in the errata to pages 6-56 to 6-61 of the DEIR.
75. Updated information concerning out-of-state natural gas supplies and regional natural gas demand is cited in the errata to pages 6-58 of the DEIR.
76. Comment noted. New cars averaged 26 miles per gallon (mpg) in 1986, despite a recent trend toward larger cars, compared to 27 mpg in 1984. The National Highway Transportation and Safety Administration has strengthened Corporate Average Fuel Economy standards from 27.5 mpg to 26.0 mpg, saving an estimated 30 million gallons of gasoline annually in California (California Energy Commission 1987).
77. See Response 47.
78. 1987 energy demand data available from utilities and the CEC correspond to utility service areas rather than the six-county SCAG region. Most recent regional data were provided by SCAG for 1979 and 1980, as shown in the errata to Table 6-11 of the DEIR.
79. Updated information concerning the use and feasibility of nuclear power is cited in the errata to page 6-60 of the DEIR.
80. Updated information concerning the current and projected use of alternative and renewable electricity sources is cited in the errata to page 6-58 of the DEIR.
81. See errata to page 6-60 of the DEIR.
82. Because of system constraints, generating plants should not be expected to operate reliably at 95 percent of capacity.
83. According to SCAQMD staff, the AQMP FEIR indicates that full implementation of Tier I, II, and III measures of the AQMP (including electrification of vehicles) would increase regional electricity demand by approximately 60,500 gigawatt-hours (Gwh) in 2010, representing a 44.2-percent increase in the projected demand shown in the FEIR.
84. Promotion of cogeneration as a mitigation measure would be inconsistent with the AQMP, as indicated in the errata to page 6-61 of the DEIR.
85. Because of conflicting evaluations and incomplete information concerning the relative capital-intensiveness of alternative and renewal energy sources to conventional energy sources, the prior reference has been deleted as indicated in the errata to page 6-61 of the DEIR.
86. Objectives for reduction of regional electricity and natural gas demand have been amended, as indicated in the errata to page 6-61 of the DEIR. See also Response 49.

87. This section of the DEIR refers to irreversible changes to natural habitat. See also the errata to page 3-6.
88. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.



county of ventura

SOLID WASTE MANAGEMENT DEPARTMENT
Kay Martin
Manager

November 18, 1988

Paul Hatanaka, Principal Planner
SCAG
600 Commonwealth Ave., Suite 1000
Los Angeles, CA 90005

Subject: SCAG Draft Growth Management Plan and Associated Draft
Environmental Impact Report

The Solid Waste management Department has reviewed the solid and hazardous waste sections of the above referenced documents for completeness and accuracy. The following comments are offered for consideration in finalizing the SCAG Growth Management Plan and the Environmental Impact Report for this document

Draft SCAG Growth Management Plan - Chapter III

Wastewater Treatment - It is assumed the figure of 8% capacity shortfall incorporates information supplied in the most recent revision of the Ventura County General Plan. This document indicates an estimated shortfall of approximately 8 million gallons per day of wastewater treatment plan capacity by the 2010.

Solid Waste - The revised Ventura County General Plan indicates that the Simi Valley Landfill could reach capacity as early as mid-1988. The Bailard Landfill in the western watershed is scheduled for reactivation by January 1989 and is permitted for five years of operation. The Toland Landfill, in the central watershed has capacity well beyond the year 2010. Asserting that Ventura County will run out of landfill capacity by 1989 is erroneous.

Draft EIR for the Draft SCAG Growth Management Plan - Chapter 6 (Solid Waste Section)

Setting - This Department questions the accuracy of the following statement found on page 6-24 of the DIER: "Despite rising costs for land, equipment, labor and environmental control systems, landfill disposal is still the cheapest means of handling those wastes". The tipping fees currently being charged by landfills within the SCAG region are not representative of the true social costs of landfilling. Social costs include potential environmental degradation (ground water contamination, air pollution, destruction of biological resources, etc.), declining property values and adverse impacts to public health and safety.



800 South Victoria Avenue, Ventura, CA 93009 (805) 654-2889 FAX (805) 654-2424



Paul Hatanaka
November 18, 1988
Page 2

Additionally, the financial compensation obtained from the sale of recyclables is not representative of the social benefits from recycling. Social benefits include avoided disposal costs, energy savings and pollution reduction resulting from the use of recycled materials (rather than virgin materials) in the manufacture of new products.

Once the social costs and benefits of alternative waste handling methods are considered, one will undoubtedly find that landfilling is not the "cheapest means" of handling wastes. Many of the alternatives mentioned in the DEIR may in fact be competitive or more economic than landfilling. One option not mentioned specifically in this section is the potential for construction of a central waste processing facility that incorporates manual and mechanical separation of recyclables and includes composting of the organic fraction of the wastestream. Some vendors have purported that they can develop this alternative at a cost of less than \$35.00 per ton and reduce total volume by as much as 85%.

Impacts and Mitigation Measures - The 1984 CWMB data for assessment of remaining landfill capacity for counties in the SCAG region appears outdated. Please refer to the 1988 Ventura County General Plan Update, Public Facilities and Services Appendix for current information regarding landfill capacities in our area.

While the countywide annual per capita waste generation rate reported for 1984 in Ventura County (1.22 tons per person per year) is relatively accurate, this figure has since escalated to 1.67 tons per person per year (based on 1987 calendar year). Incorporation of a constant per capita waste generation rate into solid waste disposal demand projections will greatly distort information, especially if other areas in the SCAG region are experiencing similar increases in per capita waste generation rates.

The "mitigation measures" presented in this DEIR are representative of a [management] strategy that supports continued reliance on landfills for managing solid waste. Given the increased emphasis on proactive waste management, we are concerned that there is not one specific mitigation measure presented in the DEIR designed to promote waste reduction, reuse and/or recycling.

Finally, this Department would like to add that the proposed mitigation measures, namely, to develop a comprehensive regional solid waste management plan and to identify site expansions and new facilities in individual solid waste management plans, are not mitigation per CEQA. Preparation of a regional plan will not ensure implementation of recommendations, nor will it ensure that recommendations contained in that plan will be effective in achieving its goals. Identification of site expansions or new facilities in revised CoSWMPs also will not ensure development of those projects.

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Cont.

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Paul Hatanaka
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Page 3

Chapter 6 (Hazardous Waste Section)

The recommended mitigation measures should include a statement that each member county of the Southern California Hazardous Waste Management Authority should adopt and implement County Hazardous Management Plans and establish waste reduction programs.

Kay Martin

Kay Martin, Manager

KM/CM/vm

RESPONSES TO THE COMMENTS OF COUNTY OF VENTURA
SOLID WASTE MANAGEMENT DEPARTMENT

89. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
90. The statement on page 6-24 of the DEIR refers only to the direct economic costs of solid waste disposal. These costs do not reflect the indirect environmental, social, and economic costs of landfilling (e.g., from groundwater contamination, air pollution, destruction of biological resources, effects on property values, and public health or safety hazards). Regional water, air quality, biological, and hazardous waste issues are addressed in the DEIR.
- Similarly, the assessment of the feasibility of recycling and other solid waste disposal alternatives on page 6-25 of the DEIR refers to direct economic and environmental constraints for such alternatives. Indirect benefits of recycling could include reduced energy demand and air pollution from manufacturing and deferral of landfilling costs. Construction of central waste processing facilities that separate recyclables and include composting could prove to be cost-effective as compared to landfilling.
91. The use of 1984 as the base year to analyze solid waste impacts is generally consistent with the methodology employed to analyze environmental impacts in the DEIR. Based on information provided by Ventura County staff, and as indicated in the errata to pages 6-25 and 6-28 of the DEIR, the 1988 Ventura County per capita waste generation rate is higher; based on this higher rate, remaining useful life of Ventura County landfill capacity would be lower than indicated in Table 6-6.
92. The mitigation statement has been amended in response to this comment, as indicated in the errata to page 6-28 of the DEIR.
93. The mitigation measures on page 6-28 of the DEIR are not limited to preparation of regional and county solid waste management plans. These measures, which are consistent with CEQA guidelines, specify that counties in the region should meet projected solid waste disposal demand by expanding existing landfill sites and developing new sites as recommended by the California Waste Management Board. See the errata to page 6-28.
94. The mitigation statement has been amended in response to this comment, as indicated in the errata to page 6-33 of the DEIR.

SUMMARY NOTES OF COMMITTEE COMMENTS

ENERGY AND ENVIRONMENT COMMITTEE

OCTOBER 27, 1988

Comments on the Draft Regional Mobility Plan and EIR

1. Consideration should be given to depressing the freeways in order to minimize their environmental impacts.
2. Question encouragement of "scenic highways" and their development as an inducement to more trips and traffic.
3. Questioned the viability of constructing new facilities verses expanding existing older facilities. Perhaps we ought to consider expansion of existing older facilities instead of developing all these new facilities. Development of new facilities tends to work against jobs/housing balance and does not lead us away from use of the automobile. Detroit needs to hear the message that we need to change the image of the automobile from being a status symbol to becoming environmentally nonpolluting.
4. An interest in the ethnic mix and how ethnic composition might impact our plans. Different segments of the population respond differently to different strategies and we shouldn't treat the entire population as though they were homogeneous. What are the impacts of expanding Asian and Hispanic populations? The plan and DEIR should reference SCAG's ethnicity report.
5. Encouraging efforts to change the image and status of transit, making commuter trains more attractive for the general public.
6. Despite our efforts to arrive at a consensus viewpoint on these transportation strategies, the marketplace may have a totally different perspective. How do we steer the marketplace into environmental awareness which would influence the auto manufacturers into designing more environmentally sensitive vehicles?
7. The marketplace maybe waiting for legislation to force the issue, e.g. no cars sold in California that aren't electric or that don't get 50 miles to a gallon.
8. Support greater share of future resources directed toward high occupancy vehicle (HOV) facilities instead of spending too much on transit.

Comments on the Draft Growth Management Plan and EIR

1. Similar to the mobility plan, the growth plan should reference the SCAG ethnicity report and address how changing ethnicity impacts jobs and housing. 96
2. The Air Quality chapter of the GMP EIR uses the 1982 AQMP as criteria for assessing air quality. Since the 1982 plan was officially disapproved by EPA, it should not be considered in the analysis and the focus of the evaluation should be on the 1988 plan. This would insure internal consistency. 97
3. The data used in the Energy chapter of the GMP EIR is obsolete, a more recent 1987 State Energy Commission report should be used in updating this section. 98

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT SCAG'S ENERGY
AND ENVIRONMENT COMMITTEE MEETING ON OCTOBER 27, 1988

95. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
96. Pages 4-11 through 4-18 of the DEIR describe how changes in ethnicity would affect jobs and housing. This information is partially based on SCAG's report, Southern California: A Region in Transition, published in December 1984.
97. Page 8-3 of the DEIR acknowledges that the 1982 AQMP was not approved by the EPA; however, the 1982 AQMP was adopted by the SCAQMD and SCAG. The DEIR also recognizes that the Draft 1988 AQMP has not yet been approved by the locals or EPA. Therefore, the DEIR air quality analysis considers both plans. The evaluation of the Draft 1988 AQMP considers the consistency of this plan with the GMP.
98. See responses to the comments of the SCAQMD.

PUBLIC HEARING

November 3, 1988

NOV 15 1988

SOUTHERN CALIFORNIA ASS'N.
OF GOVERNMENTS

1. JOEL ROSEN - CITY OF FULLERTON

Mr. Rosen stated that he was not presenting all comments on the plans, but raise 2 questions. 1) The availability of documents and technical information on the AQMP. He expressed an interest in understanding the J/H balance and the numbers involved, this information was forwarded to him from SCAG staff. The information requested included a letter from SCAG's staff counsel. He questioned what the content of the letter implied which stated that the information included in the plan should not be duplicated. Does this mean the process is closed to other agencies or entities not affiliated with SCAG or is the process open.

99

President Griffin stated the process is opened. This has been explained to Mr. Rosen at other public comment session, and that if he had other concerns this should be discussed with staff. Colin Lennard, SCAG's Legal Counsel stated that the type of letter received by Mr. Rosen is a standard letter sent by any responsible staff counsel for a public agency. The information furnished to Mr. Rosen are work documents and the information contained in the work document are not under the public records act. SCAG in fact chose to release the work documents because the process is indeed opened.

Secondly, Mr. Rosen requested that the Executive Committee request for an extension from AQMD with regards to the AQMP.

100

Thirdly, he raised concerns with reference to achieving the goals of the Plans. He stated that the City of Fullerton agrees with some of the recommendations of the J/H Balance Committee of the Regional Advisory Council. Particularly with regards to managing the type of housing distribution vs. the types of jobs. Feels that this issue should be addressed by the Executive Committee. Issues regarding the input of the numbers with regards to origin and destination information. What does this mean? If calibration takes place, he would like to see the information. The technical staff of the city of Fullerton have to present recommendation to their City Council and he would like to understand just what is going on. Staff will be communicating with Mr. Rosen regarding his specifics.

101

2. MARSHA MEDNICK - LOS ANGELES COUNTY TRANSPORTATION COMMISSION

Ms. Mednick commended SCAG staff for their work and LACTC will continue to work with staff. She stated that comments presented today are preliminary and additional comments would be forwarded after the Commission's November meeting. The LACTC recognizes the significance of the RFP and it must have the support of the local governments, transportations agencies and the public. Written and technical information have been submitted to SCAG staff and they will providing additional detail.

102

Funding was the first issue addressed. Ms. Mednick stated that currently the unconstrained project listed in the draft plan will require funding far beyond current resources. There is a projected \$30 billion capital shortfall and a \$2.6 billion annual operating shortfall. The Commission is continually seeking additional sources of funding, but the ultimate decision to approve this funding is not left up to the Commission. Therefore, LACTC cannot commit to projects that are on the unconstrained lists. Particularly when they may become federal air quality mandated that require total local financing. Second, without increase funding it is highly questionable that there will be sufficient funds to operate and maintain our existing highway systems over the next 20 years. The amount needed to operate and maintain the highway system increases annually, and will utilize all of the monies available before the year 2010. The Commission also believes the Plan should more fully acknowledge the existing shortfalls that we have now for local street and road maintenance. In Los Angeles County alone this is currently the \$111 million dollar shortfall annually. Third, the RMP should recognize that substantial federal funding will be needed to construct the recommended system including the unconstrained portion.

The Plan now depend on the enhancement of additional state and local taxes and fees. This can provide some revenues, realistically it cannot fund the entire program. If it did for LA county projects this would mean increase comparable to tripling the existing sales tax (19%) or adding \$2 per gallon in gas tax. The Commission feels this is unrealistic. Fourth, some measures of the financial strategies of the Plan may not be feasible. It is important that the Plan identify funding strategies as options to be considered during implementation.

First as part of the region's transit services, the Plan calls for an extensive long-distant line hall transit network. This is composed principally of rail-lines such as those that are now being built between Long Beach and Los Angeles, Norwalk and El Segundo, and downtown Los Angeles. The Commission believe that relying on a massive line-hall system as included in the Draft RFP maybe inconsistent with job/housing balance. Line hall systems should be developed instrumentally as the demand wants. Often less expensive, express bus service could meet the initial demand and the service could later be moved to an exclusive ride of way. 2) The draft RFP does not provide evidence that the recommended commuter rail improvement would be feasible or cost effective. Outside of those actions recommended by the LOSSAN intercity rail study, the LACTC does not support specific rail improvements until their cost effectiveness and feasibility have been evaluated. Further, the RFP should comment on the need for cooperation of the privately owned railroads for implementation of the commuter-rail recommendations. 3) The RFP proposes that adoption of a system of regionally significant highways, including arterial state highways and freeways. This system anticipates changes in federal funding categories under the new authorization bill of 1991. However, the proposed system was made available through SCAG only 2 weeks ago. The Commission believes that a system can only be adopted and carefully review by local jurisdiction, Caltrans, and the transportation agencies. This is not possible within the timeframe of the planned adoption. The Commission will continue working with SCAG and others in the near future on the issue of the new reauthorization bill.

Finally the Plan should state that if conflicts occur in planning for the various modes, conflicts would be resolved by the county transportation commissions. This existing decision-making process should be used to set priorities of the project. Any comments or questions should be directed to Marcia Mednick or Jim Simms.

102
Cont

3. HEATHER IWAMURO - COMMUTER COMPUTER

Ms. Iwamuro stated that Commuter Computer is in support of the direction of the Regional Mobility Plan, but have some concerns.

103

The increase in transit use might be too drastic insight of the fact that the average vehicle *** is subject to increase from 1.12 to only 1.18. Ms. Iwamuro stated that a vision statement might be helpful in describing what the RMP would mean to the average commuter or local communities. Commuter Computer also has technical correction to offer to Plan, and will continue to work with staff on the Plan.

4. BRYAN ALLEN - CITIZEN

Mr. Allen present comments regarding the EIR for the Regional Mobility Plan, particularly on Growth reducing impacts pg. 127 - 131. States that this section is objectively inadequate. It regurgitates the summary of the GMP in relationship to the RMP. EQA guidelines require reason responses at the very least the RMP/EIR implies the implementation of the GMP is invincible and influenced by anything in the RMP -- that is fundamentally erroneous. EQA guidelines require analysis of all accumulative impacts -- that means multi-stage impacts and include the secondary impact and measures that is intended to be mitigative and the EIR must do so in this respect. Several regulatory measures in the RMP are travel inducing despite their opposite intent. And the travel induced will tend to reinforce existing trends in growth for simultaneous dispersing of housing and excess concentration of employment in the region. That is to say the J/H balance is exasperated thereby contravening the objective of the GMP. Modeling for the RMP has failed to show these traveling inducing impacts because it is a single stage model and because it fail to model consequent land-use impacts. SCAG does have a model recently installed which could be used document these impacts. Mr. Allen stated that he contend that the EIR will continue to be inadequate in documenting the growth and travel inducing impacts of the RMP without use of the model.

104

There are fundamentally 3 ways of restraining growth and travel demand. 1) restraint by congestion itself 2) restraint by regulation by rationing 3) restraint by pricing. There is various measures in the growth demand management section of the RMP which attempts to promote restraint by regulation by incentive. The demand management section also calls for pilot program for restraint by pricing. Mr. Allen states in his opinion only restraint by pricing will be effective consistent with political limitation upon people's choices.

Bryan Allen presented copies -- these copies will be distributed to the President and Executive Director of SCAG.

Public Hearing is still open for comments. It was not closed.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE
DEIR PUBLIC HEARING ON NOVEMBER 3, 1988

99. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
100. See Response 1.
101. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
102. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
103. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
104. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.

ORIGINAL

BEFORE THE
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

IN THE MATTER OF THE:)
)
DRAFT GROWTH MANAGEMENT PLAN)
DRAFT REGIONAL MOBILITY PLAN)
-AND-)
DRAFT AIR QUALITY MANAGEMENT PLAN)

TRANSCRIPT OF PROCEEDINGS

DATE AND TIME: FRIDAY, NOVEMBER 18, 1988, 1:10 P.M.

PLACE: 600 SOUTH COMMONWEALTH AVENUE
LOS ANGELES, CALIFORNIA

REPORTER: ERIC GILLIAM, CSR
CERTIFICATE NO. 3338

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Barristers'
reporting service

1600 EAST FOURTH STREET, SUITE 220
SANTA ANA, CALIFORNIA 92701
TELEPHONE (714) 953-4447

APPEARANCES

DON GRIFFIN, PRESIDENT, SCAG
BUENA PARK CITY COUNCIL MEMBER

JUDY WRIGHT, CHAIR, SCAG TRANSPORTATION
AND COMMUNICATIONS COMMITTEE
MAYOR, CLAREMONT
HEARING OFFICER

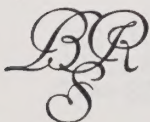
ARCHIE SNOW, CHAIR, SCAG COMMUNITY,
ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE
REDONDO BEACH CITY COUNCIL MEMBER
HEARING OFFICER

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ERIC GILLIAM, CSR 3338

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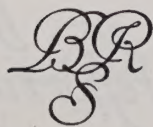


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INDEX OF SPEAKERS
FROM THE PUBLIC

<u>NAME</u>	<u>PAGE</u>
BILL GAYLC COUNTY OF ORANGE	
MARGO KOSS SIERRA CLUB, ANGELES CHAPTER	
KEN BAUER FOXMOOR HOMEOWNERS ASSOCIATION THOUSAND OAKS	
BILL WREN ONTARIO CHAMBER OF COMMERCE	
FRED J. FUJIOKA MINORITY COALITION FOR RESPONSIBLE GROWTH	
AUSTIN E. SULLIVAN CITY OF ONTARIO	
JOEL ROSEN CITY OF FULLERTON	
DORIS BRADSHAW PRIVATE CITIZEN	

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1 LOS ANGELES, CALIFORNIA, FRIDAY, OCTOBER 24, 1988

2 1:10 P.M.

3
4 PRESIDENT GRIFFIN: IF I COULD HAVE YOUR
5 ATTENTION, WE WILL GET THIS HEARING STARTED.

6 WE ARE DELIGHTED TO HAVE YOU HERE, AND I
7 KNOW THE INFORMATION AND DIALOGUE THAT WE RECEIVE TODAY
8 IS MOST IMPORTANT TO US IN DEALING WITH THE STRATEGIC
9 PLANS FOR THIS REGION.

10 I AM DON GRIFFIN, I AM COUNCILMAN IN -- FOR
11 BUENA PARK, ONE OF THE -- BUENA PARK'S ONE OF THE CITIES
12 IN ORANGE COUNTY. AND I AM ALSO THE PRESIDENT OF SCAG.

13 I WOULD LIKE TO INTRODUCE TO YOU THE TWO
14 OFFICIALS WHO WILL ACTUALLY CONDUCT THE HEARINGS.

15 TO MY FAR RIGHT, WE HAVE JUDY WRIGHT. JUDY
16 IS THE MAYOR FROM THE CITY OF CLAREMONT, AND SHE'S ALSO
17 THE CHAIR OF SCAG'S TCC, THE TRANSPORTATION AND
18 COMMUNICATIONS COMMITTEE.

19 TO MY IMMEDIATE RIGHT IS ARCHIE SNOW,
20 COUNCILMAN FROM THE CITY OF REDONDO BEACH, AND HE'S THE
21 CHAIRMAN OF SCAG'S COMMUNITY, ECONOMIC AND HUMAN
22 DEVELOPMENT COMMITTEE.

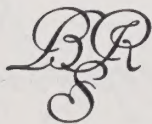
23 TOGETHER THEY WILL SERVE AS THE HEARING
24 OFFICERS FOR THE PUBLIC HEARING AND RECEIVE COMMENTS. I
25 AM GOING TO BE HERE WITH THEM AS WELL.

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1 AND WE WILL RECEIVE COMMENTS RELATIVE TO
2 SCAG'S REGIONAL GROWTH AND MOBILITY PLANS, AS WELL AS THE
3 DRAFT EIR'S ON THE PLAN.

4 I WOULD LIKE TO JUST GIVE YOU A BRIEF BIT
5 OF INFORMATION, THAT SCAG WANTED TO PROVIDE THIS
6 OPPORTUNITY TO ALL CONCERNED INDIVIDUALS AND AGENCIES,
7 AND THEREFORE HAS SCHEDULED THIS HEARING IN ORDER TO
8 RECEIVE INPUT FROM THE REGION.

9 THROUGH THESE PUBLIC HEARINGS -- ALTHOUGH
10 THESE PUBLIC HEARINGS ARE NOT REQUIRED BY LAW, OR BY THE
11 STATE ENVIRONMENTAL LAW, IN THE INTERESTS OF THE
12 HEARINGS, WE WANTED TO HEAR FROM YOU DIRECTLY, HEAR YOUR
13 CONCERNS AND YOUR THOUGHTS AND IDEAS, AS WE ALL
14 PARTICIPATE IN THIS REGION TOGETHER.

15 AND THIS IS THE SECOND OF THREE PUBLIC
16 HEARINGS WHICH HAVE BEEN SCHEDULED BY SCAG TO HEAR YOUR
17 THOUGHTS REGARDING THE SPECIFIC ISSUES.

18 THE FIRST HEARING THAT WE HAD WAS ON
19 NOVEMBER THE 3RD, AND THE NEXT ONE THAT WE WILL HAVE WILL
20 BE ON DECEMBER THE 15TH. E.

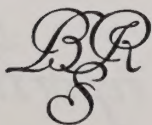
21 SO AT THIS TIME I WOULD LIKE TO TURN THE
22 MEETING OVER TO JUDY WRIGHT.

23 JUDY.

24 HEARING OFFICER WRIGHT: THANK YOU.

25 I'D LIKE TO WELCOME YOU HERE TODAY, AND

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SANTA ANA, CALIFORNIA 92701

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1 ARCHIE AND I WILL BOTH GIVE A LITTLE INTRODUCTION, AND
2 THEN WE WILL GO INTO YOUR REMARKS.

3 THE MAIN PURPOSE OF TODAY'S HEARING IS TO
4 RECEIVE COMMENTS. THERE WILL NOT BE A DISCUSSION OF THE
5 PLANS TODAY, AND WE WILL NOT ANSWER QUESTIONS UNLESS IT'S
6 FOR CLARIFICATION. THEREFORE, WE WOULD LIKE YOU TO
7 MINIMIZE YOUR QUESTIONS, ALTHOUGH THEY CERTAINLY COULD BE
8 CONTAINED IN YOUR TESTIMONY, BUT THEY WILL NOT BE
9 ANSWERED TODAY.

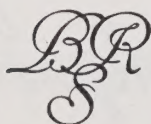
10 IF YOU WOULD PLEASE CONSOLIDATE YOUR
11 REMARKS -- AND I WILL GIVE THE TIME LIMITS IN A LITTLE
12 WHILE -- THIS WILL INSURE THAT EVERYONE IN THE ROOM HAS
13 AN OPPORTUNITY TO PRESENT THEIR TESTIMONY.

14 WE ARE WILLING TO BE HERE AS LONG AS
15 POSSIBLE, ALTHOUGH WE HOPE NO LONGER THAN 5:00, BUT THE
16 HEARING WILL END WHEN EVERYONE HAS HAD A CHANCE TO
17 TESTIFY.

18 THE PRIMARY RESPONSIBILITIES OF ARCHIE SNOW
19 AND MYSELF, THEREFORE, ARE TO RECEIVE ORAL AND WRITTEN
20 TESTIMONY AND JUST TO ASK FOR CLARIFICATION IF WE DON'T
21 UNDERSTAND SOME OF THE THINGS THAT YOU ARE TELLING US.

22 ADDITIONALLY, SOME OF YOU MAY HAVE HEARD
23 THAT THERE IS GOING TO BE A SOCIOECONOMIC IMPACT ANALYSIS
24 DONE ON THE THREE PLANS. AND THAT STUDY WILL BE
25 RELEASED ON DECEMBER 1ST. IT IS NOT AVAILABLE TODAY, AND

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1 IF SOME OF YOU HAVE COMMENTS ON THE SOCIOECONOMIC IMPACTS
2 OF THESE PLANS, YOU MIGHT WISH TO WAIT AND TESTIFY ON THE
3 15TH AFTER YOU HAVE HAD A CHANCE TO READ THAT STUDY.

4 FOR THE RECORD, AND I HAVE A FILE FOLDER
5 HERE, THIS HEARING HAS BEEN ADVERTISED THROUGH LEGAL
6 NOTICE AND ALL OF THE NOTICES ARE CONTAINED HERE, IN
7 MAJOR DAILY NEWSPAPERS IN SIX COUNTIES, THROUGH PRESS
8 RELEASES SENT TO OVER 700 NEWSPAPERS, AND THROUGH NEWS
9 LETTERS AND FLIERS TO OVER 500 AGENCIES AND INDIVIDUALS.

10 I WOULD NOW LIKE TO TELL YOU THE GUIDELINES FOR
11 SPEAKING DURING THE PUBLIC HEARING.

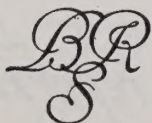
12 ALL OF YOU WHO WISH TO SPEAK SHOULD FILL
13 OUT ONE OF THESE YELLOW CARDS -- THEY ARE LOCATED OVER ON
14 THE TABLE -- AND WE ARE KEEPING THEM IN ORDER, SO WE WILL
15 CALL ON YOU IN THE ORDER THAT YOU FILLED THEM OUT.

16 IT GIVES YOU A PLACE TO PUT YOUR NAME,
17 AFFILIATION, ADDRESS AND TELEPHONE NUMBER, SO THAT IF YOU
18 WISH YOU CAN RECEIVE COMMENTS FROM SCAG ON THESE
19 HEARINGS.

20 TEN MINUTES WILL BE ALLOTTED TO EACH PERSON
21 REPRESENTING AN ORGANIZATION OR GROUP, FIVE MINUTES WILL
22 BE ALLOTTED TO INDIVIDUALS REPRESENTING THEMSELVES.

23 QUESTIONS FROM THE AUDIENCE TO THE SPEAKERS
24 PRESENTING TESTIMONY WILL NOT BE PERMITTED. YOU SHOULD
25 BE ADDRESSING THE HEARING OFFICERS.

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1 SUBMISSION OF WRITTEN TESTIMONY IS
2 ENCOURAGED. YOU CAN SUBMIT A LOT LONGER TESTIMONY TO US
3 IN WRITING AND SUMMARIZE THE TESTIMONY IN THE FIVE OR TEN
4 MINUTES. THEY SHOULD BE DISTRIBUTED TO THE HEARING
5 OFFICERS, STAFF RECORDER, AND THEN TO THE AUDIENCE IF
6 ENOUGH COPIES ARE AVAILABLE. THE WRITTEN STATEMENTS WILL
7 BE SUBMITTED INTO THE RECORD.

8 ELECTED OFFICIALS WILL BE INVITED TO SPEAK
9 FIRST, THEN SPOKESPERSONS FOR AGENCIES AND ORGANIZATIONS,
10 AND THEN INDIVIDUALS IN THE ORDER OF THEIR SIGN UP.

11 WHEN YOU COME UP TO THE PODIUM HERE, IF YOU
12 WOULD GIVE YOUR NAME AND ADDRESS AND ANY AFFILIATION THAT
13 YOU HAVE WITH AN ORGANIZATION OR AGENCY, OR IF YOU ARE
14 SPEAKING FOR YOURSELF, THAT WOULD HELP US TO KEEP TRACK
15 OF THE RECORD TODAY.

16 ORAL TESTIMONY FOR THIS PUBLIC HEARING WILL
17 BE TAPE RECORDED, AS WELL AS TRANSCRIBED BY A COURT
18 REPORTER. PERSONS INTERESTED IN HEARING THE TAPE
19 RECORDING SHOULD MAKE THEIR REQUEST TO SCAG STAFF,
20 DELAINE WINKLER -- I DON'T KNOW WHETHER DELAINE IS
21 HERE -- SHE JUST RAISED HER HAND -- AND YOU CAN CALL THE
22 SCAG NUMBER TO MAKE THAT REQUEST, WHICH IS 385-1000.

23 I WILL NOW TURN THE TIME OVER TO ARCHIE
24 SNOW.

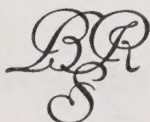
25 HEARING OFFICER SNOW: THANK YOU.

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Barristers'
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1 WE HAVE SOME PLAN DOCUMENTS FOR YOUR
2 PERUSAL.

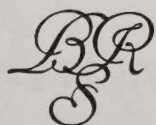
3 THE SOUTHERN CALIFORNIA ASSOCIATION OF
4 GOVERNMENTS, A REGIONAL PLANNING AGENCY THAT REPRESENTS
5 SIX COUNTIES AND MORE THAN A HUNDRED FIFTY CITIES, WILL
6 SOON ADOPT MAJOR PLANS TO GUIDE THE REGION'S FUTURE.
7 THESE PLANS AIM AT CLEANING THE AIR WE BREATHE,
8 MINIMIZING TRAFFIC CONGESTION AND MANAGING THE VAST
9 GROWTH EXPECTED IN SOUTHERN CALIFORNIA.

10 THESE PLANS ARE ALL INTERRELATED. WE
11 CANNOT IMPROVE OUR AIR UNLESS WE DO SOMETHING ABOUT
12 TRAFFIC, SINCE MOST OF OUR AIR POLLUTION COMES FROM
13 AUTOMOBILES AND TRUCKS. BUT WE CANNOT SOLVE OUR TRAFFIC
14 PROBLEMS WITHOUT BRINGING OUR JOBS AND OUR HOUSING CLOSER
15 TOGETHER, SINCE MUCH OF THE TRAFFIC PROBLEM COMES FROM
16 PEOPLE DRIVING A LONG DISTANCE TO GET TO WORK AND HOME
17 AGAIN.

18 THE PLANS HAVE IMPORTANT EFFECTS ON EACH
19 OTHER AND ALSO ON SOCIETY AS A WHOLE, ON THE WAY WE LIVE,
20 WHERE WE LIVE AND OUR JOBS.

21 THE REGIONAL GROWTH MANAGEMENT PLAN, GMP,
22 AS WE REFER TO IT, REPRESENTS A POPULATION, HOUSING AND
23 JOB FORECAST FOR THE YEAR 2010. A KEY CHOICE INVOLVES
24 DISTRIBUTING THE GROWTH SO THAT JOBS AND HOUSING ARE
25 NEARER EACH OTHER.

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barristers'
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1 THE PLAN ASSUMES THAT UNCOORDINATED LOCAL
2 GROWTH MANAGEMENT AND CONTROL EFFORTS WOULD CAUSE AN
3 UNPRODUCTIVE REDISTRIBUTION OF REGIONAL TOTALS.

4 THE GMP DISTRIBUTION OF NEW GROWTH IS
5 DESIGNED TO ACHIEVE BETTER JOB-HOUSING BALANCE IN THE
6 REGION IN ORDER TO IMPROVE MOBILITY AND AIR QUALITY.
7 ONLY A SMALL PERCENTAGE OF NEW HOUSING, 4.2 PERCENT, AND
8 NEW JOBS, 9.5 PERCENT, WOULD BE IMPACTED.

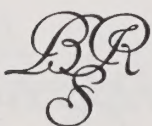
9 THE REGIONAL MOBILITY PLAN AIMS AT
10 RESTORING THE LEVEL OF MOBILITY TO WHAT WE HAD BACK IN
11 1984.

12 WHILE THE COST TO BUILD NEW FACILITIES IS
13 \$56 BILLION, THE PLAN EMPHASIZES DEMAND MANAGEMENT
14 MEASURES SUCH AS RIDESHARING, BETTER USE OF TRANSIT,
15 ALTERNATIVE WORK HOURS AND REDUCED VEHICLE TRANSIT AND
16 VEHICLE MILES TRAVELED. THE MIX OF MEASURES WE USE TO
17 REACH OUR MOBILITY GOALS WILL AFFECT OUR AIR QUALITY
18 FUTURE.

19 FOUR SEPARATE STRATEGIES THAT COULD SOLVE
20 THE PROBLEM WERE CAREFULLY EXAMINED BY SCAG'S EXECUTIVE
21 COMMITTEE OF LOCALLY ELECTED OFFICIALS.

22 THE FIRST WAS A MAJOR PROGRAM FOR BUILDING
23 NEW TRANSPORTATION FACILITIES; THE SECOND SHOWED A HEAVY
24 EMPHASIS ON DEMAND MANAGEMENT; THE THIRD WAS BUILT AROUND
25 AN INTENSE PROGRAM OF SYSTEM MANAGEMENT; THE FOURTH

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1 EMPHASIZED A BALANCE OF JOBS AND HOUSING WITHIN
2 SUBREGIONS TO SHORTEN COMMUTES.

3 THE EXECUTIVE COMMITTEE CONCLUDED THAT THE
4 BEST APPROACH WOULD COMBINE ALL OF THESE COMPONENTS. THE
5 DEGREE TO WHICH EACH OF THESE ELEMENTS IS SUCCESSFUL WILL
6 BOTH DEPEND ON AND DETERMINE WHAT IS REQUIRED FROM THE
7 OTHERS.

8 AN OVERALL PLAN IS ESSENTIAL. ONLY BY
9 FOLLOWING A COMPREHENSIVE STRATEGY, ONE THAT SHARES THE
10 COSTS AND BENEFITS OF THE SOLUTION EQUITABLY, CAN A
11 REGION RETAIN OR IMPROVE ITS MOBILITY.

12 THAT CONCLUDES OUR INTRODUCTION, AND NOW
13 IT'S TIME TO HEAR FROM YOU.

14 AND JUDY WRIGHT HERE IS THE CHIEF HEARING
15 OFFICER, SO IF YOU WILL ADDRESS YOUR QUESTIONS TO HER,
16 WHY, WE WILL APPRECIATE IT.

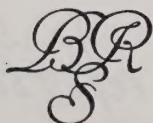
17 HEARING OFFICER WRIGHT: THANK YOU.

18 I DON'T HAVE ANY CARDS -- YELLOW CARDS FROM
19 ELECTED OFFICIALS AS YET. ARE THERE ANY ELECTED
20 OFFICIALS IN THE ROOM?

21 SEEING NO ONE, THEN WE WILL GO ON TO THE
22 ORGANIZATIONS.

23 IF SOMEONE HAS COME IN SINCE WE GAVE
24 THE RULES OF THE HEARING, YOU SHOULD FILL OUT ONE OF
25 THESE YELLOW CARDS IF YOU WISH TO SPEAK, AND THEY ARE

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1 AVAILABLE ON THE TABLE OVER THERE.

2 WE WILL TAKE ORGANIZATIONS FIRST AND THEN
3 INDIVIDUALS. ORGANIZATIONS HAVE TEN MINUTES. I DON'T
4 HAVE A STOPWATCH, BUT WE ARE GOING TO KEEP PRETTY CLOSE
5 TIME.

6 AND THE FIRST PERSON WHOSE CARD I HAVE IS
7 BILL GAYLC FROM ORANGE COUNTY.

8 MR. GAYLC: WELL, I HAVE A STOPWATCH, BUT I
9 DON'T NEED TEN MINUTES.

10 LET'S SEE, I GUESS I -- THIS IS ACTUALLY A
11 FORMAL LETTER TO --

12 HEARING OFFICER WRIGHT: COULD YOU GIVE YOUR
13 NAME, ADDRESS AND WHERE YOU ARE FROM.

14 MR. GAYLC: YES. OKAY.

15 I AM BILL GAYLC, I WORK WITH THE COUNTY OF
16 ORANGE, AND I AM -- THE OFFICIAL TITLE IS COUNTY
17 DEMOGRAPHER.

18 I WANTED TO ADDRESS THE GROWTH MANAGEMENT
19 PLAN, AND I DO HAVE A WRITTEN DOCUMENT WHICH I GUESS I
20 COULD GIVE TO --

21 HEARING OFFICER WRIGHT: NOT ENOUGH FOR ALL OF
22 US, BUT ENOUGH TO GIVE TO THE SECRETARY.

23 MR. GAYLC: NO, I DON'T. I'M SORRY.

24 HEARING OFFICER WRIGHT: THAT'S FINE. THANK
25 YOU.

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1 MR. GAYLC: IT'S SOMEWHAT THICK.

2 I JUST WANT TO GO OVER ESSENTIALLY THE
3 LETTER THAT WE PREPARED AND ADDRESS A COUPLE POINTS.

4 THE FIRST POINT IS THAT WE WANT TO RESUBMIT
5 AGAIN SUPERVISOR WEIDER'S LETTER THAT SHE PROVIDED TO DON
6 GRIFFIN REGARDING -- IS THIS GETTING FEEDBACK?

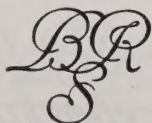
7 WE WANT TO RESUBMIT THAT LETTER AS WELL AS
8 THE BOARD MINUTE ORDER WHICH TRANSMITS WHAT ARE CALLED
9 ORANGE COUNTY PROJECTIONS, 1998, AS THE COUNTY'S OFFICIAL
10 INPUT INTO THE SCAG PROCESS.

11 SO WE WOULD LIKE TO SEE THAT THOSE NUMBERS
12 ARE INCORPORATED IN THE GROWTH MANAGEMENT PLAN AS THE
13 COUNTY'S -- AS THE COUNTY'S PORTION OF THE GROWTH
14 MANAGEMENT PLAN.

15 TWO OTHER BROADER POINTS WE WOULD LIKE
16 TO -- JUST TO HAVE ON PUBLIC RECORD TODAY IS THAT, FIRST
17 OF ALL, THE COUNTY SUPPORTS THE USE OF THE GMA LOW, WHICH
18 IS CONSISTENT WITH A -- THE COUNTY'S CONSISTENT SUPPORT
19 OF THE USE OF THE STATE DEPARTMENT OF FINANCE PROJECTIONS
20 IN THE PLAN.

21 JUST A COUPLE OF THE REASONS WHY WE DO SO
22 IS THAT FIRST WE FEEL IT WILL INSURE CONSISTENT PLANNING,
23 NOT ONLY THROUGHOUT THE REGION, BUT ALSO THROUGHOUT THE
24 STATE, BECAUSE I THINK A LOT OF WHAT WE ARE TALKING ABOUT
25 OR WHAT WE HAVE BEEN TALKING ABOUT FOR THIS WHOLE

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1 PLANNING PROCESS, IT'S NOT ONLY LOCAL GOVERNMENTS, IT'S
2 NOT ONLY THE REGION, BUT ALSO IT ENTAILS A LOT OF STATE
3 INVOLVEMENT.

4 AND I THINK A CASE IN POINT COULD BE
5 CALTRANS, WHICH IS THAT USING THE STATE DEPARTMENT OF
6 FINANCE NUMBERS, AND HERE THEY ARE INVOLVED IN
7 TRANSPORTATION PLANNING, AND YOU HAVE A SERIES OF
8 TRANSPORTATION PLANNING ACTIVITIES WHICH COULD BE
9 INCONSISTENT.

10 WE ALSO FEEL THAT THE STATE DEPARTMENT OF
11 FINANCE TRACK RECORD HAS BEEN REASONABLY -- IT'S BEEN
12 REASONABLY GOOD, BASED ON RESULTS FROM THE '80 CENSUS; OF
13 COURSE, WE WILL HAVE TO WAIT FOR THE '90 CENSUS TO SEE
14 HOW THINGS GO INTO THE FUTURE.

15 BUT ALSO WE WOULD STRONGLY SUPPORT AND WE
16 WOULD LIKE -- WE WERE -- THERE IS A PROCESS IN THE STATE
17 FOR INSURING THAT THERE IS STANDARDIZATION OF THE
18 PROJECTIONS OF -- YOU KNOW, THROUGHOUT THE STATE
19 INVOLVING THE COUNTIES AS WELL AS THE COUNCIL OF
20 GOVERNMENTS.

21 WE FELT THAT THAT PROCESS SHOULD HAVE
22 BEEN -- THERE SHOULD HAVE BEEN PARTICIPATION IN THE
23 PROCESS BY SCAG TO INSURE THAT THERE IS CONSISTENCY
24 BETWEEN THE STATE AND SCAG NUMBERS, WHICH WE FEEL THAT
25 THERE WASN'T THAT LEVEL OF PARTICIPATION.

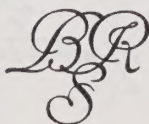
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1 WE ALSO HAVE CONCERN WITH THE ADOPTION
2 SEQUENCE, IN THAT THE AIR QUALITY MANAGEMENT PLAN
3 ALREADY, AS WELL AS THE REGIONAL HOUSING ALLOCATION
4 MODEL, DOES HAVE THE -- ARE IN EFFECT PLANS THAT ARE --
5 HAVE -- WELL, THE REGIONAL HOUSING ALLOCATION MODEL HAS
6 ALREADY BEEN -- REGIONAL HOUSING NEEDS ASSESSMENT HAS IN 105
7 EFFECT BEEN ADOPTED, WHICH THEN IN ESSENCE REALLY
8 PREDETERMINES THE DECISION, RATHER THAN ACTUALLY HAVING
9 WHAT WE FEEL IS A REAL MEANINGFUL DEBATE.

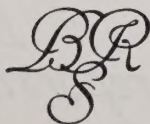
10 THE LAST AREA THAT OUR COMMENTS APPLY TO IS
11 IN THE JOB-HOUSING BALANCE.

12 ACCORDING TO THE PREFERRED -- OR THE
13 PREFERRED ALTERNATIVE FROM THE STANDPOINT OF SCAG, WHICH
14 IS GMA FOUR, IS THAT ORANGE COUNTY IS DEPICTED AS A JOB-
15 RICH AND HOUSING-POOR AREA; HOWEVER, WHEN YOU ACTUALLY
16 LOOK AT EMPLOYMENT STATISTICS AND YOU LOOK AT THE NUMBER 105
17 OF WORKERS IN COMPARISON TO THE NUMBER OF JOBS, THAT
18 ACTUALLY THERE ARE MORE WORKERS IN ORANGE COUNTY THAN
19 THERE ARE JOBS. AND I THINK THAT'S -- THAT THAT'S
20 EVIDENT BY THE NUMBER OF PEOPLE JUST THAT COMMUTE OUT OF
21 ORANGE COUNTY INTO L.A. COUNTY, FOR EXAMPLE.

22 PART OF THE PROBLEM, WE FEEL, IS THAT THE
23 METHODOLOGY THAT'S BEEN USED TO DETERMINE JOB-HOUSING
24 BALANCE IS INSENSITIVE TO THE -- TO DIFFERENTIALS IN
25 LABOR FORCE PARTICIPATION.

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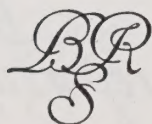
1 THE COUNTY HAS -- IN JUST LOOKING AT THE
2 REGION AS A WHOLE, WE ACTUALLY HAVE -- JUST LOOKING AT
3 THE AVERAGE NUMBER OF WORKERS PER HOUSEHOLD, WE ACTUALLY
4 HAVE MORE THAN ONE IN A -- ONE AND A HALF WORKERS PER
5 HOUSEHOLD, WHERE IN THE REGION AS A WHOLE IT'S ABOUT ONE
6 AND A THIRD WORKERS PER HOUSEHOLD. SO FOR EACH -- FOR
7 EACH HOUSING UNIT THERE ARE MORE WORKERS.

8 AND BY APPLYING THE JOB-HOUSING BALANCE AS
9 IT IS NOW APPLIED, WE WOULD ACTUALLY WORSEN A PROBLEM OF
10 PEOPLE COMMUTING OUT OF THE COUNTY BECAUSE WE ACTUALLY
11 NEED MORE JOBS, AND -- INSTEAD OF TAKING -- OR REDUCING
12 FUTURE JOBS AND ADDING A FEW MORE HOUSES WOULD ACTUALLY
13 WORSEN THE PROBLEM.

14 SO THEN THE FINAL -- UNDER JOB-HOUSING 105
15 BALANCE IS THAT WE -- WHERE WE HAVE A CONCERN IS THAT A
16 POLICY THAT ENCOURAGES THE MOVEMENT OUT OF -- OR THE
17 MOVEMENT OF JOBS OUT OF THE COUNTY MAY IN FACT BE IN
18 CONFLICT WITH THE COUNTY'S BALANCED COMMUNITY POLICY.
19 ESSENTIALLY THAT POLICY REQUIRES SEVERAL -- SEVERAL
20 PLANNED COMMUNITIES TO PROVIDE A MINIMUM -- AT LEAST A
21 NUMBER OF JOBS EQUAL TO -- AT LEAST EQUAL TO THE NUMBER
22 OF DWELLING UNITS.

23 SO IF IN FACT WE ARE ENCOURAGING JOBS TO --
24 TO MOVE OUT OF THE COUNTY, IT'S OUR CONCERN THAT IN
25 THESE -- SOME OF THE JOB-POOR AREAS OF THE COUNTY, SUCH

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1 AS SOUTH ORANGE COUNTY, WHERE WE HAVE THESE POLICIES,
2 THAT IN FACT WE WOULD NOT BE MITIGATING A -- YOU KNOW,
3 THAT IMBALANCE THAT WE HAVE IN THE COUNTY.

4 SO IF THERE'S ANY QUESTIONS, I WOULD
5 CERTAINLY BE GLAD TO ANSWER THEM AT THIS POINT.

6 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

7 MR. GAYLC: THANK YOU.

8 HEARING OFFICER WRIGHT: THE NEXT PERSON I HAVE
9 A CARD FOR IS MARGO KOSS FROM THE SIERRA CLUB.

10 MS. KOSS: I'M ACTUALLY HERE MORE AS THE VICE
11 CHAIR OF THE REGIONAL ADVISORY COUNCIL.

12 MY NAME IS MARGO KOSS, 4225 VIA ARBOLADO,
13 LOS ANGELES, CALIFORNIA.

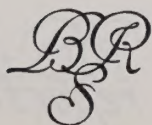
14 THE REGIONAL ADVISORY COUNCIL SUPPORTS THE
15 IDEA OF SUBREGIONAL PLANNING GROUPS AS A MEANS OF
16 IMPLEMENTING THE GROWTH MANAGEMENT AND OTHER REGIONAL
17 PLANS IN SOUTHERN CALIFORNIA.

18 THE COUNCIL URGES THAT SCAG SUPPORT THE
19 FORMATION AND OPERATION OF A NUMBER OF SUBREGIONAL
20 INTEGRATED PLANNING GROUPS WITHIN SOUTHERN CALIFORNIA,
21 CONSISTING OF CITY AND COUNTY GOVERNMENTS, SPECIAL
22 DISTRICTS, REDEVELOPMENT AGENCIES AND OTHER STAKE
23 HOLDERS, SUCH AS NEIGHBORHOOD ASSOCIATIONS, BUILDERS
24 GROUPS AND ENVIRONMENTAL GROUPS FROM WITHIN EACH
25 SUBREGION.

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1 THESE GROUPS SHOULD BE FORMED AROUND
2 EXISTING GROUPS WHENEVER POSSIBLE. FOR EXAMPLE,
3 SUBREGIONAL COUNCILS OF GOVERNMENT THAT NOW EXIST.

4 SUBREGIONAL BOUNDARIES SHOULD BE REDEFINED
5 WHERE NECESSARY TO OBTAIN THE BEST POSSIBLE FIT WITH
6 EXISTING ORGANIZATIONAL, SOCIAL AND GEOGRAPHIC PATTERNS.

7 WE SUPPORT SUCH SUBREGIONAL GROUPS BECAUSE
8 LOCAL GOVERNMENTS, ACTING SEPARATELY, CANNOT ADEQUATELY
9 SOLVE PROBLEMS THAT CROSS LOCAL BOUNDARIES, BUT THE
10 ENTIRE SOUTHERN CALIFORNIA REGION IS TOO LARGE TO PERMIT
11 FOR THE REGION AS A WHOLE THE KIND OF FACE-TO-FACE
12 INCLUSIVE, INTENSIVE AND COLLABORATIVE PLANNING AND
13 PROBLEM SOLVING THAT IS NEEDED.

14 SUBREGIONAL GROUPS, IN ADDITION TO WORKING
15 ON PROBLEMS IN THEIR SUBREGIONS, SHOULD ALSO PARTICIPATE
16 IN REGIONWIDE PLANNING PROGRAMS, INCLUDING SCAG'S, SO AS
17 TO INTEGRATE SUBREGIONAL GOALS AND PLANS INTO A COHERENT,
18 WORKABLE, REGIONAL COMPREHENSIVE PLAN.

19 FUNDING FOR THE SUBREGIONAL PLANNING
20 PROCESS SHOULD COME FROM FEDERAL, STATE AND LOCAL
21 AGENCIES THAT HAVE RESPONSIBILITY CURRENTLY FOR
22 IMPLEMENTATION OF THE MAJOR REGIONAL PLANS: AIR QUALITY,
23 HOUSING, AND COMMUNITY DEVELOPMENT AND TRANSPORTATION
24 AGENCIES.

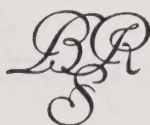
25 EXISTING REGIONAL ORGANIZATIONS, SUCH AS

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1 SCAG, SHOULD BE FUNDED TO PROVIDE SUPPORT FOR SUBREGIONAL
2 PLANNING IN THOSE SUBREGIONS WHERE SUCH SUPPORT IS
3 DESIRED AND NEEDED.

105

4 SUPPORT COULD TAKE THE FORM OF PROVIDING
5 MODELS FOR A SUBREGIONAL PLANNING PROCESS, FACILITATING
6 INITIAL FORMATION OF GROUPS, PROVIDING SUBREGIONAL DATA
7 FROM REGIONAL DATA BASES AND PROVIDING TECHNICAL SERVICES
8 IN DATA COLLECTION AND ANALYSIS.

9 THANK YOU.

10 HEARING OFFICER WRIGHT: THANK YOU. AND FOR
11 KEEPING IT SO SHORT, TOO.

12 THE NEXT PERSON TO SPEAK IS KEN BAUER, WHO
13 IS PRESIDENT OF THE FOXMOOR HOMEOWNERS ASSOCIATION IN
14 THOUSAND OAKS.

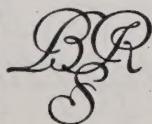
15 MR. BAUER: I DID BRING COPIES, IF THAT WOULD
16 HELP.

17 MY NAME IS KEN BAUER, AND I LIVE AT 1658
18 MARGATE PLACE IN THOUSAND OAKS.

19 AT THE PRESENT TIME I AM THE PRESIDENT OF
20 THE FOXMOOR HOMEOWNERS ASSOCIATION OF 252 HOMES, A BOARD
21 MEMBER OF THE WESTLAKE VILLAGE JOINT BOARD AND
22 ASSOCIATION OF 39 VARIOUS HOMEOWNERS ASSOCIATIONS IN OUR
23 AREA, AND A MEMBER OF THE THOUSAND OAKS GENERAL PLAN
24 REVIEW COMMITTEE, CIRCULATION AND OPEN SPACE COMMITTEE,
25 AND A CITIZENS ADVISORY COMMITTEE FOR REDEVELOPMENT AREA

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1 IN THE AREA OF THOUSAND OAKS.

2 MY CONCERNS FOCUS ON OUR FINITE SUPPLY OF
3 NATURAL RESOURCES, OF WATER, AIR, UTILIZATION OF LAND,
4 EDUCATIONAL NEEDS, AND THE ALLEVIATION OF OUR INTOLERABLE
5 ROADWAY TRAFFIC AND CONJESTION.

6 I AGREE WITH MANY OF THE CONCLUSIONS
7 OUTLINED IN YOUR OVERVIEW DOCUMENT.

8 I ESPECIALLY AGREE WITH YOUR CONCLUSION
9 THAT THERE IS A DEFINITE INTERRELATIONSHIP BETWEEN ALL OF
10 THE PROBLEMS AND CHALLENGES FACING ALL OF US IN SOUTHERN
11 CALIFORNIA, AS WELL AS BETWEEN THE VARIOUS REGIONS OF
12 SOUTHERN CALIFORNIA.

13 THE GROWTH PROJECTIONS FOR THE FUTURE, IF
14 EVEN CLOSE TO YOUR PROJECTIONS, WILL HAVE DEVASTATING
15 EFFECTS ON THIS REGION, IF NOT EFFECTIVELY PLANNED FOR
16 AND MANAGED FROM THIS POINT FORWARD.

17 IT IS MY OPINION THAT IT IS EXTREMELY
18 IMPORTANT THAT PRIORITY BE PLACED ON LAND USE PLANNING
19 AND DECISION MAKING AS WE PROGRESS TO THE YEAR 2000.

20 THE SCOPE AND NATURE OF THE CUMULATIVE
21 IMPACTS FROM INDIVIDUAL PROJECTS MUST BE GIVEN GREATER
22 CONSIDERATION THAN IN THE PAST. IN FAR TOO MANY
23 INSTANCES THE DECISION-MAKING BODIES SIMPLY LOOKED AT THE
24 SITES' SPECIFIC IMPACTS AND DID NOT PLAN FOR OR MITIGATE
25 THE CUMULATIVE IMPACTS. FUTURE DECISION MAKING MUST BE

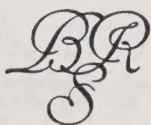
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1 INFLUENCED BY THE INTERRELATED ASPECTS OF THE IMPACTS OF
2 LAND-USE DECISIONS.

3 I'D LIKE TO OFFER FIVE IDEAS FOR YOUR
4 CONSIDERATION AND INCLUSION INTO YOUR FINAL DOCUMENT.

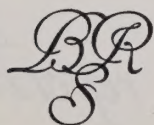
5 FIRST: AN EMPHASIS ON EDUCATION LITERACY
6 MUST BECOME A PRIORITY GOAL.

7 TO ACCOMPLISH THIS I WOULD SUGGEST THAT
8 FUTURE TEACHER SALARY ADJUSTMENTS AT A LEVEL ABOVE THE
9 RATE OF INFLATION SHOULD BE TIED TO A RISE IN THE
10 LITERACY LEVEL AND TEST SCORES ON A DISTRICT-BY-DISTRICT
11 BASIS. THE INCREASED COSTS WILL MORE THAN BE OFFSET BY
12 THE ADDITIONAL TAX REVENUE GENERATED BY THE NEW ENTRANTS'
13 WAGE-EARNING CAPACITY AS THEY ENTER THE WORK FORCE, AND
14 THEIR REDUCTION ON DEPENDENCE ON THE SAFETY NET OF SOCIAL
15 SERVICES PROVIDED.

16 NO. 2: SPECIFIC ATTENTION TO LAND USE
17 PLANNING AND THE DENSITY OF PROJECTS APPROVED IN THE
18 FUTURE MUST BE EMPHASIZED. THE OVER-INTENSIFICATION OF
19 PARCELS IS A PRIMARY CONTRIBUTING FACTOR TO ALL OF THE
20 ADVERSE IMPACTS WE ARE ATTEMPTING TO WORK OUT -- WORK OUR
21 WAY OUT FROM UNDER.

22 PLEASE KEEP IN MIND THAT NEITHER THE NOLAN
23 NOR THE FIRST ENGLISH SUPREME COURT RULINGS GUARANTEED A
24 PROPERTY OWNER TOTAL FREEDOM WITH RESPECT TO THE USE OF
25 HIS PROPERTY. THEY SIMPLY STATED THAT ONE COULD NOT BE

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1 DENIED ALL ECONOMIC USE. SUBSEQUENT COURT RULINGS HAVE
2 HELD THAT GOVERNING AGENCIES COULD REDUCE THE ZONING AND
3 RESULTING DENSITY BY AS MUCH AS 90 PERCENT WITHOUT BEING
4 IN VIOLATION OF THE LAW.

5 NO. 3, I WOULD LIKE TO ENCOURAGE THE
6 ADOPTION OF A TAX ON PARKING FACILITIES SERVING THE
7 CENTERS OF EMPLOYMENT. AN EXEMPTION OF 50 PERCENT WOULD
8 BE GRANTED TO VEHICLES WITH TWO RIDERS AND AN EXEMPTION
9 OF 100 PERCENT WOULD BE GRANTED TO VEHICLES WITH THREE OR
10 MORE RIDERS, THE REVENUE TO BE USED FOR THE ENCOURAGEMENT
11 AND SUBSIDY OF CAR, VAN POOLS AND BUS USE.

12 AT THE PRESENT TIME THE FEDERAL GOVERNMENT
13 HAS A PROVISION IN THE TAX CODE THAT STATES THAT ANY
14 SUBSIDY GRANTED BY A COMPANY TO EMPLOYEES GREATER THAN
15 \$15 A MONTH SHALL CAUSE THE ENTIRE AMOUNT TO BE INCLUDED
16 AS INCOME TO THAT EMPLOYEE. THIS IS IN REGARDS TO
17 TRANSPORTATION SUBSIDIES.

18 THE COLLECTIVE LOBBYING OF THIS GROUP WITH
19 THEIR CONGRESSIONAL REPRESENTATIVES TO INCREASE THIS
20 LIMIT TO FIFTY OR A HUNDRED DOLLARS A MONTH WOULD ALLOW
21 COMPANIES TO INCREASE THE SUBSIDY AND THE EMPLOYEE NOT TO
22 BE PENALIZED. THE RESULT WOULD BE A MUCH HIGHER
23 UTILIZATION OF CAR, VAN POOLS AND BUSES WITHIN OUR AREA.

24 THE FIFTH AND FINAL AND THE MOST
25 SIGNIFICANT SUGGESTION I WOULD OFFER TO ALL OF YOU WOULD

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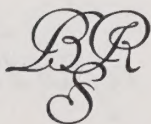
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1 BE TO LINK ALL FUTURE NEW AND HIGHER DENSITY PROJECTS TO
2 THE LEVEL OF SERVICE LEVELS ON OUR MAJOR ARTERIALS
3 LEADING TO OUR FREEWAY NETWORK. REPLACEMENT PROJECTS OF
4 THE SAME OR LOWER DENSITY WOULD BE EXEMPTED AND NOT
5 IMPACTED BY THIS PROPOSAL.

6 THE SUGGESTION IS:

7 BETWEEN NOW AND THE YEAR 1990, ABANDON ALL
8 PROJECTS WHERE THE LEVEL OF SERVICE IS EQUAL TO "F" AND
9 GREATER THAN 100 PERCENT.

10 BETWEEN 1991 AND 2000, ABANDON ALL PROJECTS 105
11 WHERE THE LEVEL OF SERVICE IS GREATER THAN "F."

12 BETWEEN 2001 AND 2010, A BAN ON ALL
13 PROJECTS WHERE THE LEVEL OF SERVICE IS "E" OR "F."

14 AND THE YEAR 2011 BEYOND, A BAN ON PROJECTS
15 WHERE THE LEVEL OF SERVICE IS "D," "E" OR "F."

16 THIS TYPE OF PHASED APPROACH WILL ADDRESS
17 OUR MOST SERIOUS SITUATIONS FIRST, AND WILL CAUSE THE
18 DEVELOPMENT COMMUNITY TO WORK TOGETHER TO MITIGATE THE
19 IMPACTS OF FUTURE NEW AND HIGHER DENSITY PROJECTS.

20 I WOULD JUST LIKE TO LEAVE YOU WITH A
21 LITTLE STORY, SOME FOOD FOR THOUGHT, MAYBE.

22 I WANT TO THANK YOU FOR THE OPPORTUNITY TO
23 ADDRESS YOU.

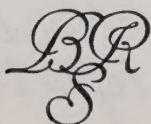
24 AND JUST FOR A MINUTE I WOULD LIKE YOU TO
25 PICTURE YOURSELF RIDING ON A TRAIN ANYWHERE IN CALIFORNIA

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1 AT A FAIRLY HIGH RATE OF SPEED.

2 NOW, ONE OF THE MOST CRITICAL COMPONENTS OF
3 A SATISFACTORY OPERATION OF A RAIL SYSTEM IS THE
4 STRENGTH, STABILITY AND WELL BEING OF THE UNDERLYING
5 RAILROAD TIES THAT SUPPORT AND PROVIDE BASIC STRUCTURE
6 FOR THE RAIL SYSTEM TO FUNCTION.

7 NOW PICTURE THIS TRAIN BEING UTILIZED TO A
8 HIGHER AND HIGHER DEGREE BY MORE AND MORE RIDERS WITH NO
9 PROVISION FOR THE MAINTENANCE AND REPLACEMENT OF THE
10 RAILROAD TIES AS THEY DETERIORATE FROM USE OVER THE
11 YEARS.

12 WHAT HAPPENS? WELL, THE SYSTEM WORKS AND
13 WORKS VERY WELL FOR A LONG TIME, UNTIL ONE OR TWO OF THE
14 TIES SIMPLY CANNOT SUPPORT THE LOAD, BURDEN AND STRESS
15 CREATED. THE TRAIN THAT HAS FUNCTIONED SO SUCCESSFULLY
16 FOR SO MANY YEARS BECOMES DERAILED, AND A CALAMITY OF
17 TREMENDOUS MAGNITUDE RESULTS WITH ABSOLUTELY NO WARNING
18 BUT THAT EVERYONE WAS ABLE TOPREDICT. THE RAILROAD TIES
19 OF OUR LIFE JOURNEY ARE OUR AIR, WATER SUPPLY, THE SEWER
20 SYSTEMS AND SOLID LAND FILLS, OUR EDUCATIONAL PROCESS AND
21 LAST BUT NOT LEAST, OUR TRANSPORTATION SYSTEM.

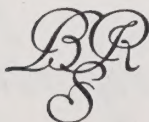
22 WE HAVE AND WILL CONTINUE TO FUNCTION HERE
23 IN THE SOUTHERN CALIFORNIA AREA; HOWEVER, THE UNDERLYING
24 BASE IS BEING UTILIZED AND STRESSED BEYOND ANY CAPACITY
25 EVER ENVISIONED. IF ANY ONE, MUCH LESS MORE THAN ONE,

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1 COMPONENT OF OUR DELICATE ECOSYSTEM FAILS, OUR ENTIRE
2 SOCIETY WILL BE SEVERELY IMPACTED AND RESTRICTED. U.

3 OUR FUTURE AND OUR CHILDREN'S FUTURE ARE IN
4 YOUR HANDS, AND THE DECISIONS THAT ARE MADE AND SUGGESTED
5 BY THIS BODY WILL IMPACT AND MOLD OUR LIFESTYLE FAR INTO
6 THE NEXT CENTURY.

7 THANK YOU.

8 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

9 BEFORE WE GO ON TO THE NEXT SPEAKER, I
10 WOULD LIKE TO SAY FOR THOSE OF YOU WHO HAVE COME IN SINCE
11 WE ANNOUNCED LAST, THAT IF YOU WISH TO SPEAK YOU NEED TO
12 FILL OUT ONE OF THE YELLOW CARDS. AND THEN WE WILL PUT
13 YOU IN ORDER HERE.

14 THE YELLOW CARDS ARE LOCATED ON THE TABLE
15 TO YOUR RIGHT.

16 THE NEXT PERSON WHO WOULD LIKE TO SPEAK IS
17 BILL WREN FROM THE ONTARIO CHAMBER OF COMMERCE.

18 MR. WREN: GOOD AFTERNOON.

19 I AM BILL WREN WITH THE ONTARIO CHAMBER OF
20 COMMERCE, AND I AM THE VICE CHAIRMAN OF THE GOVERNMENT
21 RELATIONS COUNCIL.

22 I ALSO REPRESENT TODAY THE ECONOMIC -- THE
23 INLAND EMPIRE ECONOMIC COUNCIL, WHICH IS A CONSORTIUM OF
24 BUSINESSES IN RIVERSIDE COUNTY, AS WELL AS THE SAN
25 BERNARDINO COUNTY.

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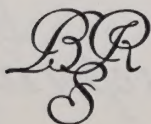
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1 FIRST I WOULD LIKE TO THANK YOU FOR
2 ALLOWING US TO ADDRESS YOU THIS AFTERNOON.

3 THE TASK OF CREATING PLANS TO PROVIDE A
4 BLUEPRINT FOR FUTURE GROWTH IN SUCH A DIVERSE AND MASSIVE
5 REGION OF OURS IS A MONUMENTAL ONE. WE RECOGNIZE THAT
6 AND WE WANT TO SUPPORT AND PARTICIPATE WITH YOU IN THIS
7 PLANNING EFFORT EXAMINING THE REGION AS A WHOLE, WITH THE
8 OBJECTIVE THAT THE PLAN WOULD BENEFIT ALL THE COUNTIES.

9 WE AGREE WITH SCAG'S PLANS WHICH CALL FOR A
10 JOB-HOUSING BALANCE TO HELP ALLEVIATE MUCH OF THE TRAFFIC
11 AND AIR POLLUTION PROBLEMS WHICH DESTROY OUR QUALITY OF
12 LIFE HERE, AND WE FULLY ENDORSE AN EMPHASIS ON THE
13 CREATION OF JOBS IN LABOR-INTENSIVE AREAS.

14 WHILE WE AGREE WITH THE OVERALL PREMISE OF
15 WHAT SCAG IS ATTEMPTING TO DO, WE FIND THAT MANY TIMES
16 THE PROPOSED PLANS DO NOT AN ADEQUATELY COVER ITS GOALS. 105

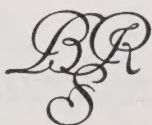
17 IN ADDITION, WE BELIEVE THE PLANS FAIL TO
18 CONSIDER WHAT THE IMPACT WILL BE ON OUTERLYING AREAS AND
19 REGIONS LIKE SAN BERNARDINO AND RIVERSIDE COUNTIES.

20 I DO HAVE WRITTEN COMMENTS, AND I WILL
21 DISTRIBUTE THEM AFTER THIS TALK. BUT I WOULD LIKE TO
22 TOUCH ON A FEW OF THE GENERAL CONCERNS THAT WE DID HAVE.

23 I WILL BEGIN WITH THE GROWTH MANAGEMENT
24 PLAN. THERE ARE THREE BASIC ISSUES WE FOUND.

25 THE FIRST IS THERE SEEMS TO BE AN

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1 ASSUMPTION THAT THE GROWTH NUMBERS OR PROJECTIONS THAT
2 ARE DONE WILL BE NOT BE AFFECTED BY THE AIR QUALITY
3 MANAGEMENT PLAN. WE BELIEVE THAT THIS IS A BIG
4 ASSUMPTION, AND IT IS NOT A VALID ONE.

5 THE AIR QUALITY PLAN CALLS FOR SPECIFIC
6 RESTRICTIONS ON SOME GROWTH. WHAT WILL THE AFFECT BE ON
7 JOBS WHEN THE AIR QUALITY PLAN IS ADOPTED?

8 SECONDLY, THE GROWTH MANAGEMENT PLAN NEVER
9 GIVES YOU A SENSE OF URBAN FORM. THE URBAN FORM IT'S
10 TRYING TO CREATE. IF YOU READ THE ENTIRE PLAN YOU END UP 105
11 WONDERING WHAT SCAG IS TRYING TO ACCOMPLISH. A FEW
12 PARAGRAPHS AND SOME MAPS OUTLINING WHAT THE REGION IS
13 SUPPOSED TO LOOK LIKE WILL HELP THE PUBLIC UNDERSTAND
14 WHAT URBAN FORM IN THE FUTURE IS BEING PROPOSED.

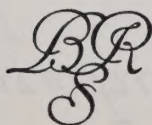
15 LASTLY, THE PLAN ASSUMES IT CAN LEGISLATE
16 CHANGES IN PEOPLE'S BEHAVIOR BY CREATING INCENTIVES OR
17 PENALTIES. WE TEND TO DISAGREE WITH THE ASSUMPTION.

18 THE PLAN ASSUMES THAT AFTER THESE
19 INCENTIVES ARE IN PLACE PEOPLE WILL BEHAVE ACCORDINGLY.

20 THE ENVIRONMENTAL IMPACT REPORT FOR THE
21 GROWTH MANAGEMENT PLAN UNDERPLAYS THE IMPACT THESE PLANS
22 WILL HAVE ON OUR LIFESTYLES. THE INDIVIDUAL IMPACT NEEDS 106
23 TO BE DEFINED MORE CLEARLY FOR ALL TO UNDERSTAND.

24 BETWEEN BOTH PLANS, THE GROWTH MANAGEMENT
25 AND MOBILITY, THE WAY THE POLICIES ARE ARRANGED ARE NOT 105

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1 NECESSARILY JOB-HOUSING INDUCING, NOR ARE THEY
2 NECESSARILY FEASIBLE.

3 THE MANAGEMENT PLANS APPENDIX IS NOTHING
4 MORE THAN A WISH LIST EXPLAINING WAYS TO OBTAIN A
5 JOB-HOUSING BALANCE. THERE IS A MENU OF POSSIBLE ACTION,
6 BUT NO ADOPTION LIST -- NO ADOPTIVE LIST SHOWING WHAT
7 NEEDS TO HAPPEN. BASICALLY A SERIES OF MEASURES HAVE
8 BEEN USED; MEASURES, I SHOULD ADD, WHICH ARE BASED ON
9 OLDER TRENDS.

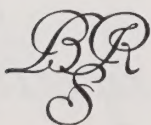
10 YOU HAVE IDENTIFIED THE ADVANTAGES OF EACH
11 MEASURE AND HAVE NOT LOOKED INTO THE IMPACT OF HOW THESE
12 MEASURES WOULD WORK TOGETHER.

13 FOR INSTANCE, THE MOBILITY PLAN SUGGESTS
14 THAT STAGGERED WORK HOURS, TELECOMMUTING AND RIDE SHARING 105
15 PROGRAMS BE INSTITUTED. IF YOU HAVE 20 PERCENT OF YOUR
16 EMPLOYEES WORKING AT HOME AND 60 PERCENT WORKING ODD
17 HOURS, HOW ARE YOU ABLE TO ACCOMPLISH THE RIDE SHARING
18 QUOTAS MANDATED BY REGULATION 15? PARTICULARLY IN FIRMS
19 AS SMALL AS 25 EMPLOYEES.

20 LET ME FOCUS ON THE JOB-HOUSING BALANCE
21 ISSUE.

22 THE PLAN OUGHT TO EMPHASIZE THE CREATION OF
23 JOBS WHERE WORKERS LIVE, RATHER THAN ARTIFICIALLY
24 INDUCING HOUSING BACK INTO THE EXISTING COMMERCIAL AREAS.
25 THIS IS ESPECIALLY TRUE WITH WEST SAN BERNARDINO COUNTY.

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1 THE PLAN ISN'T SPECIFIC ENOUGH AS TO HOW JOBS WILL BE
2 INDUCED. YOU SHOULD BE DRAWING INDUSTRY OUT THERE TO
3 BALANCE OUR GROWTH.

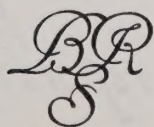
4 IN LOS ANGELES AND ORANGE COUNTY THE PLAN
5 CALLS FOR ADDING APPROXIMATELY 50 JOBS FOR EVERY 100 NEW
6 RESIDENTS. IN RIVERSIDE AND SAN BERNARDINO COUNTIES, ON
7 THE OTHER HAND, THE PLAN CALLS FOR CREATING ABOUT 33 JOBS
8 FOR EVERY HUNDRED NEW PEOPLE. THE NET RESULT IS THAT WE
9 WILL BE ADDING MORE PEOPLE IN OUTERLYING REGIONS THAT
10 WILL HAVE TO COMMUTE.

11 THE PLAN EMPHASIZES ALSO THE WRONG SIDE, WE
12 FEEL, OF THE JOB-HOUSING EQUATION. RATHER THAN
13 EMPHASIZING THE CREATION OF JOBS IN THE OUTLYING REGIONS 105
14 WHERE PEOPLE ALREADY LIVE, BECAUSE THE LAND IS LESS
15 EXPENSIVE, THE PLAN ATTEMPTS TO CONSTRAIN HOUSING IN
16 THESE REGIONS. BY TYING -- TRYING TO FORCE HOUSING INTO
17 THE MORE EXPENSIVE LAND IN OUR REGION, IT WILL ONLY
18 INCREASE THE COST OF HOUSING AND FURTHER REDUCE THE
19 SUPPLY OF THOSE HOMES WHICH ARE NEEDED TO SUPPLY HOUSING
20 FOR LOW AND MODERATE INCOME FAMILIES.

21 ANOTHER FAULT WE FOUND IN THE PLAN WAS
22 THE LACK OF CONSISTENCY BETWEEN GROWTH MANAGEMENT,
23 MOBILITY AND THE AIR MANAGEMENT POLICIES.

24 WE HAVE IDENTIFIED MANY OF THESE
25 INCONSISTENCIES IN MY WRITTEN COMMENTS WHICH I WILL HAND

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1 OUT.

2 FOR EXAMPLE, THOUGH, THE GROWTH MANAGEMENT
3 PLAN CALLS FOR FACILITATING THE MOVEMENT OF BUSINESS, AND
4 MENTIONS THE OFFSET REQUIREMENTS.

5 THE AIR MANAGEMENT PLAN, ON THE OTHER HAND,
6 MAKES IT AWKWARD TO MOVE BUSINESSES FROM ONE AREA TO
7 ANOTHER. SCAG'S PLAN LITERALLY IN THIS CASE DISAGREES
8 WITH THE AQMP. THERE IS NO QUANTIFIABLE RELATIONSHIP
9 BETWEEN THE CREATION OF THE JOB-HOUSING PLAN AND THE
10 MOBILITY PLAN.

11 THE PLANS BEG FOR CONSISTENCY.

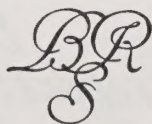
12 COMMENTS IN THE MOBILITY PLAN SHOULD
13 DIRECTLY COLLABORATE WITH THE GROWTH MANAGEMENT AND VICE 105
14 VERSA.

15 AND THEY BEG FOR AN EYE TOWARD THE ENTIRE
16 REGION.

17 FOR INSTANCE, THE MOBILITY PLAN UNDER
18 AVIATION POLICIES, THERE IS NO MENTION OF THE GROUND
19 ACCESS MOVEMENT AT THE ONTARIO INTERNATIONAL AIRPORT USED
20 BY APPROXIMATELY FIVE MILLION PEOPLE PER YEAR. THE PLAN
21 DISCUSSES IMPROVEMENT OPTIONS IN THE LOS ANGELES, BURBANK
22 AND ORANGE COUNTY AIRPORTS, BUT NO PRIORITY IS GIVEN TO
23 ONTARIO.

24 IN CLOSING, SCAG IS DEVELOPING PLANS THAT
25 WILL CHANGE THE LIFESTYLE OF EVERYONE IN CALIFORNIA,

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1 WITHOUT FURTHER ACKNOWLEDGING THE ACCEPTANCE OF THAT
2 CHANGE TO THE INDIVIDUAL, WHETHER OR NOT THAT INDIVIDUAL
3 ACTUALLY WILL ACCEPT THAT CHANGE.

4 IN ADDITION, BOTH THE ENVIRONMENTAL IMPACT
5 REPORTS AND THE PLANS THEMSELVES SERIOUSLY UNDERPLAY THE
6 ECONOMIC IMPACT ON THE AREAS.

7 THE KEY TO IMPLEMENTING A JOB-HOUSING
8 BALANCE IS TO ALLOW THE FREE MARKETPLACE TO DRIVE THE
9 PROGRAM FORWARD. YOU DON'T ALLOW A FREE MARKET SYSTEM TO
10 FOLLOW IF YOU ENFORCE PENALTIES AND CONSTRAINTS. STRONG
11 INCENTIVES, WE FEEL, ARE NEEDED TO BE GIVEN TO DRIVE THE
12 MARKETPLACE TO TAKE ADVANTAGE OF IMPROVED ECONOMICS.
13 ONLY THEN WILL YOU SEE THE PROGRAM TRULY BE IMPLEMENTED.

14 THANK YOU VERY MUCH. I APPRECIATE THE
15 OPPORTUNITY TO TALK TO YOU.

16 HEARING OFFICER WRIGHT: THANK YOU.

17 IF YOU WILL GIVE US A COPY OF YOUR REMARKS
18 OR ONE TO THE SECRETARY. PLEASE.

19 MR. BAUER: YES.

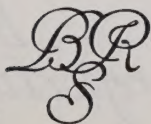
20 HEARING OFFICER WRIGHT: THANK YOU.

21 THE NEXT PERSON WHOSE CARD I HAVE IS FRED
22 FUJIOKA, FROM THE MINORITY COALITION FOR RESPONSIBLE
23 GROWTH.

24 MR. FUJIOKA: THANK YOU.

25 MY NAME IS FRED FUJIOKA, MY ADDRESS IS 911

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1 WILSHIRE BOULEVARD, SUITE 1070, LOS ANGELES.

2 GOOD AFTERNOON.

3 I AM AN ATTORNEY IN PRIVATE PRACTICE AND
4 THE INCOMING PRESIDENT OF THE JAPANESE AMERICAN BAR
5 ASSOCIATION; HOWEVER, TODAY I AM SPEAKING AS A MEMBER OF
6 AND ON BEHALF OF THE MINORITY COALITION FOR RESPONSIBLE
7 GROWTH.

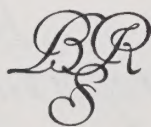
8 FIRST OF ALL, I WOULD LIKE TO EXPRESS MY
9 APPRECIATION FOR THIS OPPORTUNITY TO COMMENT ON THE DRAFT
10 GROWTH MANAGEMENT PLAN IN THE EIR.

11 THE PROJECT PROPOSES A CONCEPT OF
12 JOBS-HOUSING BALANCE AS A TOOL TO BE SHAPED TO REDUCE THE
13 NEGATIVE IMPACTS OF COMMUTING. JOBS-HOUSING BALANCE
14 WOULD REDIRECT GROWTH AS A PRIMARY TOOL. TWELVE PERCENT
15 OF THE FUTURE GROWTH IN EMPLOYMENT WOULD BE DIVERTED TO
16 JOB-RICH AREAS WHERE CONCENTRATIONS OF MINORITY
17 POPULATIONS ARE HIGHEST AND WHERE EMPLOYMENT NEEDS ARE
18 MOST SEVERE -- I AM SORRY, FROM THE JOB-RICH AREAS. THEY
19 WOULD BE DIVERTED TO JOB-POOR AREAS WHERE OUTCOMMUTING IS
20 PROJECTED TO GROW THE MOST.

21 UNDERSTOOD IN ITS SIMPLEST FORM,
22 JOBS-HOUSING BALANCE PROPOSES THAT OPPORTUNITIES MUST BE
23 ENHANCED FOR PEOPLE TO LIVE NEAR THEIR PLACES OF
24 EMPLOYMENT OR VICE VERSA.

25 WE HAVE NO QUARREL WITH THIS PROPOSAL, IN | 105

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1 FACT WE SUPPORT IT; HOWEVER, WE ARE CONCERNED THAT THE
2 TRANSLATION OF THE CONCEPT AND REALITY BE GUIDED BY A
3 PROCESS THAT INDEED SOLVES THE PROBLEM WITHOUT WORSENING
4 OTHERS. THUS THE DESIGN OF THE MECHANISM IS CRITICAL.

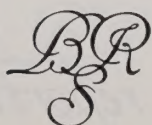
5 THE ACTION TO SOLVE THE COMMUTE PROBLEMS
6 COULD HAVE THE UNINTENDED RESULT OF EXACERBATING THE
7 UNEMPLOYMENT PROBLEM IN AREAS WITH PARTICULARLY
8 DIFFICULT-TO-MEET EMPLOYMENT NEEDS.

9 THE MINORITY POPULATION COULD SUFFER FROM
10 DECREASED EMPLOYMENT OPPORTUNITIES, AND THOSE
11 ENTREPRENEURS WHO MIGHT WISH TO CREATE EMPLOYMENT
12 OPPORTUNITIES FOR THE POPULATION MOST IN NEED COULD HAVE
13 THEIR MARKET ADVERSELY AFFECTED BY POORLY DESIGNED JOBS-
14 HOUSING BALANCE PROGRAM.

15 OUR SECOND CONCERN IS THAT THE GROWTH
16 MANAGEMENT PLAN CONTAINS POTENTIAL MASSIVE IMPACTS AND
17 STRINGENT, SOPHISTICATED CUTTING-EDGE MITIGATION ACTIONS.
18 THE STAFF IS TO BE COMMENDED FOR ITS THOROUGH JOB IN THIS
19 REGARD. YET IF WE ACCEPT THAT THESE ANALYSES ARE
20 ACCURATE AND THAT THE MITIGATION ACTIONS ARE REASONABLE
21 AND PRUDENT, THE EFFORT STILL FALLS SHORT.

22 MOST OF THE ACTIONS RECOMMENDED AS
23 MITIGATION MEASURES REQUIRE NO COMMITMENT FROM THOSE WHO
24 HAVE THE MEANS AND AUTHORITY TO MOVE THE ACTIONS FORWARD.
25 OBTAINING THAT COMMITMENT IS THE KEY FULFILLMENT OF THE

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1 GMP, AS WELL AS THE OTHER SCAG PLANS CURRENTLY UNDER
2 REVIEW -- AIR QUALITY, MOBILITY AND HOUSING -- THAT ARE
3 BASED ON ITS FINDINGS.

105

4 THUS, THE REAL MATTER BEFORE US AS CITIZENS
5 OF THE REGION IS THE MIX OF POLITICAL AND ECONOMIC
6 FORCES, BOTH PUBLIC AND PRIVATE, THAT MUST BE FORGED ANEW
7 IF THE MANAGEMENT OF THE REGION'S GROWTH IS TO BE
8 ACHIEVED.

9 CLEARLY, INDIVIDUALS, JURISDICTIONS AND
10 BUSINESSES ACTING ALONE WILL PROVE INADEQUATE NO MATTER
11 THE DEGREE OR QUALITY OF COMMITMENT TO MITIGATING THE
12 IMPACT OF THE PLAN. WHAT IS REQUIRED IS SOMETHING THAT
13 DOESN'T EXIST NOW.

14 WHILE WE HAVE ALL GROWN ACCUSTOMED TO OUR
15 CURRENT STATE, COUNTY, LOCAL GOVERNMENT DESIGN OF
16 GOVERNANCE, WE MUST NOW BE WILLING TO CONSIDER, IN THE
17 FACE OF THE GROSS REGIONAL IMPACTS OUTLINED, A NEW
18 APPROACH TO COPING WITH OUR PROBLEMS.

19 IN CONCLUSION, THE POLITICAL FORUM IN WHICH
20 FUTURE DECISIONS ARE MADE ON MATTERS AS IMPORTANT AS
21 THOSE DISCUSSED IN THE GMP MUST BE INCLUSIVE OF ALL
22 INTERESTS, INCLUDING THOSE OF ETHNIC MINORITIES, IF IT IS
23 TO BE CREDIBLE AND PRODUCTIVE.

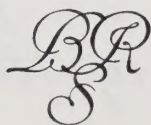
24 THANK YOU VERY MUCH. I HAVE SUBMITTED
25 WRITTEN COPIES OF MY PRESENTATION.

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1 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

2 I WILL REPEAT AGAIN, SOME OF YOU ARE
3 GETTING TIRED OF THIS, BUT I WANT TO MAKE SURE EVERYONE
4 KNOWS, IF YOU HAVE COME IN SINCE THE LAST TIME, YOU NEED
5 TO FILL OUT ONE OF THESE CARDS IF YOU WISH TO SPEAK THIS
6 AFTERNOON, AND THE CARDS ARE AVAILABLE ON THE TABLE FOR
7 YOU TO FILL OUT.

8 THE NEXT PERSON TO SPEAK IS AUSTIN SULLIVAN
9 FROM THE CITY OF ONTARIO.

10 MR. SULLIVAN: GOOD AFTERNOON.

11 I AM AUSTIN SULLIVAN, FROM THE CITY OF
12 ONTARIO.

13 I DID NOT EXPECT TO MAKE A VERBAL
14 PRESENTATION THIS AFTERNOON. OUR COMMENTS ARE IN
15 WRITING.

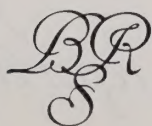
16 BUT IN THE EARLIER COMMENTS I HAVE TWO
17 QUESTIONS WHICH I HOPE CAN BE ANSWERED.

18 ONE HAS TO DO WITH THE PERIOD DURING WHICH
19 PUBLIC COMMENT CAN BE MADE ON THESE DOCUMENTS.

20 I CALLED SCAG STAFF EARLIER IN THE WEEK,
21 AND THEY INDICATED THAT THIS MEETING TODAY WOULD BE THE
22 LAST TIME ANY PUBLIC TESTIMONY COULD BE TAKEN; IS THAT
23 CORRECT? OR IS THE DECEMBER 15TH MEETING -- WILL PUBLIC
24 TESTIMONY BE TAKEN AT THAT TIME?

25 HEARING OFFICER WRIGHT: DECEMBER 15TH IS THE

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1 LAST PUBLIC HEARING, AND IT IS EXPECTED THE PLANS WILL BE
2 ADOPTED BY THE SCAG EXECUTIVE COMMITTEE THAT DAY.

3 THE AIR QUALITY MANAGEMENT PLAN IS EXPECTED
4 TO BE ADOPTED BY THE AIR QUALITY MANAGEMENT DISTRICT
5 BOARD ON THE 16TH.

6 MR. SULLIVAN: I GUESS I HAVE TO ASK,
7 THEN, IF PUBLIC COMMENT IS TO BE TAKEN ON THAT DAY,
8 PRESUMABLY ON THE EIR'S. I WOULD THINK THAT THOSE
9 COMMENTS WOULD NEED TO BE RESPONDED TO IN THE EIR, AND I
10 AM CONFUSED ABOUT THAT. AND I --

11 HEARING OFFICER WRIGHT: I AM SORRY, I DO HAVE
12 ANOTHER BIT OF INFORMATION HERE ON THE EIR: THE LAST DAY
13 FOR WRITTEN COMMENT IS TODAY.

14 MR. SULLIVAN: OKAY.

15 HEARING OFFICER WRIGHT: SO THAT THOSE COMMENTS
16 WILL BE RESPONDED TO BY THE 15TH, I ASSUME.

17 MR. SULLIVAN: OKAY. THAT CLARIFIES THAT.

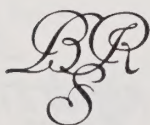
18 HEARING OFFICER WRIGHT: I AM SORRY. IF THAT
19 ANSWERS YOUR QUESTION.

20 MR. SULLIVAN: THANK YOU VERY MUCH.

21 THE OTHER QUESTION HAS TO DO WITH THE
22 SOCIOECONOMIC STUDY WHICH WAS MENTIONED EARLIER.

23 AND I GUESS I -- I DON'T KNOW WHETHER THAT
24 IS PART OF EITHER OF THE EIR'S. IS IT? OR WAS IT A
25 SEPARATE, FREE-STANDING DOCUMENT?

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1 HEARING OFFICER WRIGHT: I BELIEVE IT WAS A
2 SEPARATE DOCUMENT THAT WAS REQUESTED BY COUNCIL MEMBER
3 FARREL FROM LOS ANGELES, AND IT WILL BE READY ON DECEMBER
4 1ST. AND I AM SURE THAT YOU COULD COMMENT ON THAT ON THE
5 15TH.

6 BUT IT IS NOT PART OF THE EIR.

7 MR. SULLIVAN: THANK YOU VERY MUCH.

8 HEARING OFFICER WRIGHT: THANK YOU.

9 WE WILL THEN GO ON TO THE NEXT PERSON WHO
10 HAS REQUESTED TO SPEAK. JOEL ROSEN, ASSOCIATE PLANNER
11 FROM THE CITY OF FULLERTON.

12 MR. ROSEN: THANK YOU FOR THE OPPORTUNITY TO
13 COMMENT TODAY.

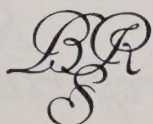
14 MY NAME IS JOEL ROSEN, I AM ASSOCIATE
15 PLANNER OF THE CITY OF FULLERTON, AND I AM HERE TO
16 COMMENT BOTH ON THE GROWTH MANAGEMENT PLAN AND THE
17 REGIONAL MOBILITY PLAN.

18 BEFORE MY COMMENTS BEGIN I WOULD LIKE TO
19 SUBMIT FOR THE RECORD A FORMAL PROPOSAL TO SCAG TO -- AND
20 STRESS TO THE EXECUTIVE DIRECTOR TO INCREASE THE --
21 EXTEND THE TIME OF COMMENT ON THE EIR FOR BOTH THE GROWTH
22 MANAGEMENT AND REGIONAL MOBILITY PLAN.

23 WE ASK FOR 15 MORE DAYS TO CONFORM TO A
24 45-DAY REVIEW PERIOD, WHICH IS NORMAL FOR PLANS OF
25 REGIONAL SIGNIFICANCE, AND ALTHOUGH SCAG DID REQUEST THAT

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1 THERE BE A REDUCTION IN REVIEW PERIOD, PUBLIC COMMENT
2 REVIEW TIME TO 30 DAYS INSTEAD OF THE NORMAL 45 DAYS FROM
3 THE STATE AND IT WAS GRANTED TO THEM, WE FEEL IT'S
4 APPROPRIATE THAT ADDITIONAL TIME BE ADDED, GIVEN THE
5 COMPLEXITY OF THIS NATURE, COMPLEXITY OF THE ISSUES, AND
6 THE UNAVAILABILITY OF CERTAIN DOCUMENTS YET.

7 AND IN THAT CAPACITY WITH MY SECOND LETTER,
8 WHICH WILL --

9 HEARING OFFICER WRIGHT: I WILL INTERRUPT YOU
10 AND SAY THAT SCAG IS NOT IN DISAGREEMENT WITH YOUR
11 SENTIMENTS. I THINK BOTH THE TRANSPORTATION COMMITTEE
12 AND THE EXECUTIVE COMMITTEE HAVE REQUESTED MORE TIME ON
13 THE PLANS, AND THAT TIME HAS BEEN GRANTED ONCE, I THINK
14 EXTENDED A MONTH. I DON'T THINK IT IT WILL BE GRANTED
15 AGAIN.

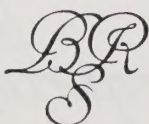
16 PRESIDENT GRIFFIN: THE EC COMMITTEE MEETING, I
17 THINK WHICH YOU WERE IN ATTENDANCE, WAS A UNANIMOUS VOTE
18 BY THE EXECUTIVE COMMITTEE TO IN FACT REQUEST AN
19 EXTENSION OF TIME.

20 AT THIS POINT, THE DECISION BY THE AQMD IS
21 ONE THAT HAS GOVERNED, AND THE TIME HAS NOT BEEN EXTENDED
22 BEYOND THEIR DATE OF DECEMBER 16TH.

23 MR. ROSEN: I UNDERSTAND.

24 BUT UNDER "SEE-KWA " GUIDELINES WE ARE
25 STILL ALLOWED TO ASK, INDIVIDUALLY AT LEAST, FOR AN

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1 EXTENSION OF TIME, SO WE ARE DOING THAT TODAY.

2 WE ARE ALSO ASKING FOR THE TECHNICAL
3 APPENDICES TO THE REGIONAL MOBILITY PLAN, WHICH ARE NOT
4 AVAILABLE, AND ALTHOUGH I HAVE CALLED STAFF AND THEY SAID 105
5 IF I WANT SPECIFIC ONES I CAN GET THEM POSSIBLY, I AM
6 FORMALLY REQUESTING FROM SCAG THAT ALL OF THE TECHNICAL
7 APPENDICES BE MADE AVAILABLE.

8 I HAVE THAT LETTER HERE IN A FORMAL REQUEST
9 TO THAT EFFECT. I WILL SUBMIT THAT FOR THE RECORD.

10 HEARING OFFICER WRIGHT: JUST GIVE IT TO THE
11 PERSON BEHIND YOU THERE.

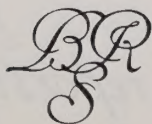
12 THANK YOU.

13 MR. ROSEN: I WOULD LIKE TO STATE FOR THE RECORD
14 THAT THE CITY OF FULLERTON IS FUNDAMENTALLY OPPOSED TO
15 UTILIZING MANDATORY MEANS TO ARTIFICIALLY SHIFT THE
16 LOCATION OF FUTURE JOBS AND HOUSING IN THE REGION.

17 THE CITY DOES NOT QUESTION THE GOAL OF
18 GETTING WORKERS CLOSER TO THE JOBS. AS A MATTER OF FACT,
19 THE CITY ITSELF HAS A GOAL OF CONCENTRATING HOUSING NEAR
20 EMPLOYMENT CENTERS.

21 FOR EXAMPLE, THE CITY PERMITS AND 105
22 ENCOURAGES THE MIXED USE OF RESIDENTIAL AND COMMERCIAL
23 DEVELOPMENT IN THE DOWNTOWN REDEVELOPMENT AREA. WE JUST
24 RECENTLY APPROVED A MIXED-USE PROJECT, AS A MATTER OF
25 FACT, OF A HUNDRED AND THIRTY UNITS, RIGHT IN OUR DOWN-

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1 TOWN CORE AREA.

2 HOWEVER, SETTING UP A NEW AND COMPLEX
3 BUREAUCRATIC STRUCTURE WITH PIE-IN-THE-SKY QUOTAS, FEES
4 AND EXACTIONS FLIES IN THE FACE OF COMMON SENSE AND THE
5 MARKETPLACE.

6 THE ABILITY TO ACHIEVE A JOBS-HOUSING
7 BALANCE WHICH WOULD POSITIVELY IMPACT AIR QUALITY AND
8 MOBILITY SHORT OF ILLEGALLY REQUIRING INDUSTRY TO HIRE
9 EMPLOYEES WHO LIVE WITHIN A DEFINED DISTANCE IS EXTREMELY
10 QUESTIONABLE.

11 FULLERTON IS A GOOD EXAMPLE OF THE PROBLEM
12 FACED. FULLERTON IS CONSIDERED A JOB-RICH COMMUNITY. IN
13 1980, ACCORDING TO THE FEDERAL CENSUS, WE HAD A JOBS-
14 HOUSING RATIO OF 1.6, WHICH WAS ABOUT 63,000 JOBS TO
15 APPROXIMATELY 40,000 HOUSING UNITS. YET 63 PERCENT OF
16 THE WORKERS WHO LIVED IN FULLERTON COMMUTED OUT OF THE
17 CITY. AS A MATTER OF FACT, 20 PERCENT OF THE WORKERS WHO
18 LIVE IN THE CITY HAD COMMUTES OF 30 MINUTES OR MORE.

19 WHAT THIS INDICATES IS THAT EVEN IN
20 BALANCED -- QUOTE, UNQUOTE, BALANCED COMMUNITIES, IT MAY
21 BE THE CASE THAT PEOPLE CHOOSE TO LIVE AND WORK IN
22 DIFFERENT PLACES.

23 FOR INDUSTRY, THE DECISION ON WHERE TO SITE
24 A FACILITY MAY BE FOR COMPLEX FINANCIAL REASONS OR IT MAY
25 BE AS SIMPLE AS PROXIMITY TO THE CHIEF EXECUTIVE

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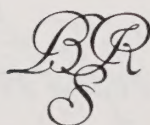
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1 OFFICER'S HOME.

2 FORCING EMPLOYERS OUT OF ORANGE COUNTY, FOR
3 EXAMPLE, WILL NOT GUARANTEE THAT THEY RELOCATE IN SAN
4 BERNARDINO OR RIVERSIDE COUNTY.

5 I GUESS IF BUSINESS IS FORCED FROM THE
6 REGION IT'S GOOD FOR AIR QUALITY BUT LOUSY FOR THE
7 ECONOMY.

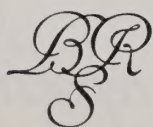
8 I DID HAVE A DISCUSSION WITH A HIGH LEVEL
9 MEMBER OF THE AIR QUALITY DISTRICT. HE FEELS -- AND I
10 AGREED WITH HIS CONSENSUS -- THAT THIS CONCEPT OF JOBS-
11 HOUSING BALANCE IS IN FACT AN ECONOMIC DEVELOPMENT PLAN
12 FOR THE INLAND EMPIRE. THAT IS THE ISSUE. THAT'S FINE
13 IF THAT IS THE ISSUE. AND WE SHOULD HAVE THAT POSSIBLY
14 AS AN ISSUE. IT SHOULD NOT, HOWEVER, BE DISGUISED AS A
15 GROWTH MANAGEMENT PLAN FOR THE ENTIRE REGION.

16 I WOULD ALSO LIKE TO COMMENT ON A NUMBER OF
17 THE STRATEGIES THAT ARE SUGGESTED TO ACHIEVE THE GOALS IN
18 THE PLAN.

19 FOR EXAMPLE, THE TELECOMMUTING GOAL OF 20
20 PERCENT TRIP REDUCTION FOR CITY EMPLOYEES IS ABSURD;
21 AFTER YOU TAKE OUT THE FIRE, THE POLICE, THE MAINTENANCE
22 AND OTHER ESSENTIAL PERSONNEL. AT LEAST IN THE CITY OF
23 FULLERTON'S CASE, YOU ARE NOT LEFT WITH ENOUGH ELIGIBLE
24 EMPLOYEES TO ACHIEVE A 20-PERCENT REDUCTION WITHOUT
25 HAVING THOSE EMPLOYEES WHO ARE LEFT OVER COMMUTE OVER 50

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619-455-1997*Barristers'*
reporting service

1 PERCENT OF THE TIME. WHICH MEANS YOU BASICALLY DON'T
2 HAVE ANYBODY IN SUPPORT CAPACITY IN YOUR OFFICE.

3 ANOTHER STRATEGY OF REQUIRING LOCAL
4 GOVERNMENT TO CONDITION BUSINESS LICENSE APPROVAL TO
5 SUBMISSION OF RIDE SHARE PLANS IS IN FACT NOT LEGAL.
6 BUSINESS LICENSE APPROVAL IS AN ADMINISTERIAL ACT, AND IS
7 NOT A POLICE POWER.

8 THE GOAL OF APPLYING RIDE SHARING ORDINANCE
9 TO EMPLOYERS OF 25 OR MORE WILL BE EXTREMELY COSTLY, AND
10 IMPOSSIBLE FOR MOST LOCAL JURISDICTIONS TO IMPLEMENT.
11 THEY HAVE NEITHER THE MONEY NOR THE STAFF TO IMPLEMENT
12 THE SUGGESTED PLAN.

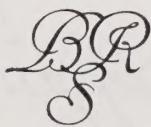
13 SCAG NOR THE AIR QUALITY DISTRICT HAVE ANY
14 IDEA OF THE ENORMITY OF THIS TASK. I HAVE TRIED TO FIND
15 OUT HOW MANY EMPLOYERS THERE ARE WITH 25 OR MORE
16 EMPLOYEES OR CENTERS OF 25 OR MORE EMPLOYEES; NO ONE HAS
17 ANY IDEA, AS FAR AS I KNOW.

18 ELIMINATION OF FREE PARKING IN ALL BUT
19 RESIDENTIAL AREAS WILL BE A BUREAUCRATIC NIGHTMARE.
20 CHARGING \$5 PER DAY FOR PARKING, FOR EXAMPLE, IN ORANGE
21 COUNTY, WILL CAUSE UNDUE HARDSHIP ON THE POOR.

22 THESE ARE JUST A SPRINKLING OF SOME OF THE
23 COMMENTS WE HAVE. WE WILL BE SUBMITTING ADDITIONAL
24 COMMENTS AS I AM ABLE TO PRODUCE THEM.

25 IT'S VERY DIFFICULT FOR A CITY OF LOCAL

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1 GOVERNMENT OF OUR SIZE WITH TWO PEOPLE IN THE ADVANCED
2 PLANNING SECTION TO DIGEST THE MAJOR PLANS THAT ARE BEING
3 DUMPED ON US IN THE LAST FEW MONTHS. WE HAVE SOLID WASTE
4 MANAGEMENT PLANS, WE HAVE GROWTH MANAGEMENT PLANS FROM
5 YOUR FOLKS, WE HAVE AIR QUALITY PLANS, WE HAVE EIR'S;
6 IT'S AN EXTREMELY DIFFICULT PROCESS.

7 WE RESPECTFULLY AGAIN REQUEST THAT SOME
8 ADDITIONAL TIME BE GRANTED TO US TO BE ABLE TO UNDERSTAND
9 THESE PLANS AND INTEGRATE THESE PLANS TOGETHER.

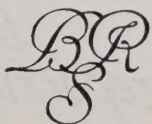
10 FOR US ONE OF THE FUNDAMENTAL ISSUES IS HOW
11 DOES THE JOBS-HOUSING BALANCE WORK. WE TRIED TO FIND OUT
12 THE ANSWER TO THAT QUESTION. REQUESTED INFORMATION FROM
13 SCAG; IT TOOK THREAT OF LEGAL ACTION TO GET SOME OF THE
14 INFORMATION FROM SCAG.

15 WE THEN RECEIVED IT FINALLY -- LET'S SEE,
16 WE RECEIVED THIS LAST WEEK. THIS IS THE PLAN RIGHT HERE.
17 THIS IS THE PLAN (INDICATING). THESE ARE THE LITTLE
18 FORMULAS THAT TELL US HOW THE JOBS AND HOUSING ARE GOING
19 TO BE SHIFTED AND WHERE THEY ARE GOING TO GO AND IN WHICH
20 REGIONS THEY ARE GOING TO END UP.

21 TO US IT'S IMPORTANT TO UNDERSTAND THIS
22 DOCUMENT, OR I GUESS YOU WOULD CALL IT THIS PRINT-OUT.
23 BUT IT TAKES MORE THAN A WEEK FOR US TO DO THAT.

24 I THANK YOU AGAIN FOR THE OPPORTUNITY TO
25 COMMENT TODAY, AND I HOPE THAT WE WILL BE ABLE TO PROVIDE

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1 USEFUL COMMENTS TO DEVELOP A PLAN THAT WOULD LEAD TO
2 COOPERATION AMONG THE JURISDICTIONS AND HOPEFULLY SOLVE
3 SOME OF THE PROBLEMS THAT FACE THIS REGION.

4 THANK YOU.

5 HEARING OFFICER WRIGHT: I THINK PRESIDENT
6 GRIFFIN HAS A QUESTION.

7 PRESIDENT GRIFFIN: YES, I WOULD LIKE TO ASK
8 YOU, JOEL, IF YOU WOULD, HAVE YOU MADE A REQUEST TO THE
9 AIR QUALITY DISTRICT REGARDING THE TIME EXTENSION?

10 MR. ROSEN: YES, WE HAVE.

11 PRESIDENT GRIFFIN: OKAY. THAT'S IMPORTANT THAT
12 YOU DO THAT AND CONTINUE TO DO THAT.

13 MR. ROSEN: WE FORMALLY DID THAT, AS DID A
14 NUMBER OF OTHER JURISDICTIONS, AND THEY DENIED IT.

15 PRESIDENT GRIFFIN: ALL RIGHT.

16 SECONDLY, DO YOU HAVE ANY DIRECT EVIDENCE
17 THAT WOULD RELATE TO THE ISSUE THAT YOU RAISED WITH
18 REGARD TO THE INLAND EMPIRE?

19 MR. ROSEN: DIRECT EVIDENCE? I AM NOT SURE WHAT
20 YOU ARE SAYING.

21 PRESIDENT GRIFFIN: WITH REGARD TO -- YOU
22 RELATED TO THE INLAND EMPIRE HAVING A -- SOME KIND OF
23 A -- WELL, I TOOK IT AS A PLAN.

24 MR. ROSEN: NO, I WASN'T -- I WASN'T SAYING IT
25 WAS THE INLAND EMPIRE TRYING TO ACHIEVE THIS NECESSARILY.

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1 WHAT I WAS TRYING TO SAY IS THAT WHAT WE
2 ARE SEEING AND WHY WE SEE TREMENDOUS SUPPORT FROM THE
3 INLAND EMPIRE IS THAT THEY ARE HOPING THAT THIS WILL BE
4 AN ECONOMIC DEVELOPMENT PLAN FOR THEM.

5 I UNDERSTAND THAT, THAT MAKES SENSE. IF I
6 WAS LIVING IN THE INLAND EMPIRE AND INVOLVED IN ECONOMIC
7 ISSUES THERE AND INVOLVED IN THE BUSINESS COMMUNITY I
8 WOULD PROBABLY BE SUPPORTING THE INCREASE IN JOBS IN MY
9 COMMUNITY. THAT MAKES SENSE.

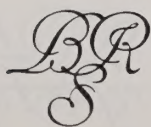
10 BUT IF YOU ARE TYING IT TO QUOTE, UNQUOTE,
11 A GROWTH MANAGEMENT PLAN THAT IS SUPPOSED TO INCREASE
12 MOBILITY AND DECREASED AIR POLLUTION, YOU HAVE SOME
13 FUNDAMENTAL PROBLEMS THERE.

14 IF YOU ARE TRYING TO CREATE THE ECONOMIC
15 DEVELOPMENT OF THE INLAND EMPIRE, THAT'S FINE. IF YOU
16 ARE TRYING TO DECREASE AIR POLLUTION AND INCREASE
17 MOBILITY, YOU HAVE TO ADDRESS THOSE ISSUES DIRECTLY, AND
18 I DON'T FEEL THAT GROWTH MANAGEMENT DOES THAT AS RELATED
19 IN THIS PLAN.

20 HEARING OFFICER WRIGHT: WELL, I THINK THAT WE
21 WOULD APPRECIATE SOME MORE INFORMATION IN WRITING IF YOU
22 HAVE IT ON THE INLAND EMPIRE, BECAUSE I GUESS I DID NOT
23 INTERPRET MR. WREN'S COMMENTS AS SUPPORTIVE. SO I THINK
24 THAT'S VERY INTERESTING.

25 MR. SULLIVAN IS SHAKING HIS HEAD, FROM THE

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1 CITY OF ONTARIO.

2 THANK YOU VERY MUCH.

3 THE NEXT SPEAKER IS AN INDIVIDUAL, AND I
4 GUESS WE HAVE NO MORE GROUPS HERE TODAY WHO WISH TO
5 SPEAK.

6 IT'S DORIS BRADSHAW, WHO LISTS HERSELF AS A
7 CONCERNED CITIZEN.

8 MS. BRADSHAW: GOOD AFTERNOON.

9 MY NAME IS DORIS BRADSHAW, MY ADDRESS IS
10 19044 SANTA RITA STREET, TARZANA, IN THE SAN FERNANDO
11 VALLEY.

12 AND I WAS MAILED A COPY OF THE OVERVIEW. I
13 HAVE NOT SEEN ANY OTHER INFORMATION ON THE PROPOSED
14 PLANS, BUT I ASSUME THAT THERE ARE OTHER OPTIONS IN
15 SOLVING THE AIR QUALITY PROBLEM IN ADDITION TO CHANGING
16 THE HOUSING PATTERNS.

17 AND I WANTED TO BRING YOUR ATTENTION TO
18 THE FACT THAT A PROJECT IS -- FEDERAL PROJECT IS IN
19 PROGRESS THAT IS IN VIOLATION OF THE NATIONAL
20 ENVIRONMENTAL POLICY ACT AS FAR AS -- FOR FAILING TO
21 FORMALLY COORDINATE WITH THE AIR QUALITY MANAGEMENT
22 DISTRICT.

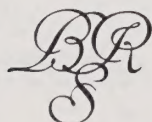
23 AND THE DISTRICT SAYS IT DOES NOT HAVE THE
24 AUTHORITY TO PUT A HALT OR FORCE THE AGENCY TO COMPLY.
25 AND THEREFORE, I AM WONDERING WHY THIS TAKES PLACE IF IT

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1 IS COMMON POLICY THAT AGENCIES, CIVIC AGENCIES, ARE ABLE
2 TO PROCEED IN VIOLATION OF OUR ESTABLISHED AIR QUALITY
3 STANDARDS, AND IF LOGICALLY THAT SHOULD NOT TAKE PLACE 105
4 WHEN WE ARE IN THE SITUATION WE ARE. AND SO I CAME TO
5 BRING THAT TO YOUR ATTENTION.

6 AND THEN ALSO IN THE GROWTH MANAGEMENT
7 SECTION OF THE OVERVIEW, I NOTICED A REFERENCE TO
8 PROPOSING PLANS FOR TRANSPORTATION, HOUSING, AIR QUALITY,
9 ET CETERA.

10 WELL, IN THE "ET CETERA," WE HAVE A SEVERE
11 FLOODING PROBLEM, AND I AM SPEAKING OF LOS ANGELES
12 COUNTY.

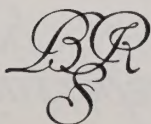
13 I LIVE UPSTREAM IN THE LA RIVER SECTION,
14 AND I AM VERY MUCH CONCERNED ABOUT THE -- WHAT'S CALLED A
15 CRISIS IN FLOODING BECAUSE OF GROWTH ISSUES.

16 SO I BROUGHT SOME INFORMATION THAT THE ARMY 105
17 CORPS OF ENGINEERS PROVIDED LAST YEAR AND A LITTLE BIT OF
18 BACK-UP TO THAT SO THAT I COULD ADVERTISE THIS PROBLEM.
19 LOGICALLY IT SHOULD ALSO BE CONSIDERED AN IN-GROWTH
20 ISSUE.

21 BECAUSE THE ONE LETTER I INCLUDED INSIDE
22 THE BROCHURE -- YOU CAN READ LATER -- IS FROM THE COUNTY
23 OF -- DEPARTMENT OF PUBLIC WORKS. IT TRACES THE FLOOD
24 CRISIS TO --

25 HEARING OFFICER WRIGHT: IF YOU WOULD ADDRESS

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1 THE HEARING BOARD. WE'D APPRECIATE IT.

2 MS. BRADSHAW: I AM SORRY. YES. THANK YOU.

3 DIRECT DEVELOPMENT OF WATERSHED. AND WE
4 HAVE OUTGROWN OUR FLOOD SYSTEM IN LA COUNTY.

5 THIS BROCHURE GIVES YOU A MAP SHOWING THAT
6 THE CUMULATIVE EFFECTS OF THE FLOODING, NOW BY THE TIME
7 IT REACHES THE LONG BEACH AREA, IS VERY, VERY SERIOUS.
8 AND IF WE HAVE WHAT'S CALLED A HUNDRED YEAR STORM THIS
9 WINTER IT WILL OVERFLOW THE BANKS AND CAUSE SEVERE
10 FLOODING AND DAMAGE TO LIVES AND PROPERTY AT THAT END.

11 NOW, THE STUDY IN PROGRESS IS CALLED THE
12 LOS ANGELES COUNTY DRAINAGE AREA STUDY, IT'S DUE TO BE
13 FINISHED IN 1990, AND I WOULD HOPE THAT IN YOUR -- THE
14 PLANS THAT YOU ARE PUTTING TOGETHER YOU WOULD COORDINATE
15 WITH THE ARMY CORPS OF ENGINEERS.

16 ONE OF THE PROBLEMS OF THE CUMULATIVE
17 EFFECT OF THE RUNOFF IS THE INSTALLATION OF STORM DRAINS.

18 SO UPSTREAM -- I INCLUDE A PICTURE OF STORM
19 DRAINS READY TO GO IN IN THE FIFTH DISTRICT, WHERE MOST
20 OF THE UNDEVELOPED WATERSHED EXISTS. THAT'S UPSTREAM.

21 AND I HAVE SPOKEN TO CITY OFFICIALS, THEY
22 SAY IT'S A COUNTY PROBLEM; I HAVE TALKED TO THE COUNTY,
23 WITH NO -- NOT MUCH RESPONSE AT ALL.

24 SO I AM THROWING THE BALL TO YOU, AND MAYBE
25 TOGETHER YOU CAN COME UP WITH SOME LOGICAL SOLUTION THAT

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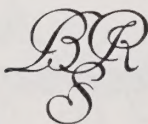
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1 WILL NOT GIVE US A BANGLADESH-TYPE AFFAIR DOWN IN LONG
2 BEACH.

3 THANK YOU.

4 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

5 THOSE ARE ALL THE CARDS THAT I HAVE, SO I
6 ASSUME THAT NO ONE ELSE IN THE AUDIENCE WISHES TO SPEAK
7 TODAY.

8 AND UNLESS THERE ARE ANY COMMENTS FROM
9 HEARING OFFICERS, I THINK THAT CONCLUDES OUR HEARING.

10 ARE THERE ANY OTHERS IN THE AUDIENCE WHO
11 WISH TO -- WHO CAME TODAY TO SPEAK, TO WATCH WHAT WAS
12 GOING ON FIRST OR SOMETHING?

13 IF NOT, THEN THIS CONCLUDES OUR HEARING.

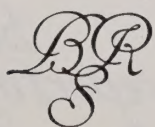
14 AND YOU HAVE ANOTHER TIME TO APPEAR, AND
15 THAT'S ON DECEMBER 15TH, IN THIS SAME ROOM.

16 THANK YOU VERY MUCH FOR COMING.

17 (THE PROCEEDINGS WERE

18 ADJOURNED AT 2:15 P.M.)
19
20
21
22
23
24
25

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REPORTER'S CERTIFICATE

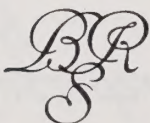
I, ERIC GILLIAM, HEREBY CERTIFY THAT ON
THE 18TH DAY OF NOVEMBER, 1988, I DID REPORT
IN SHORTHAND THE TESTIMONY AND PROCEEDINGS OF THE FOREGOING
PROCEEDINGS; THAT AT THE CONCLUSION OF THE ABOVE ENTITLED
MATTER, I DID TRANSCRIBE MY SHORTHAND NOTES INTO TYPEWRITING,
AND THAT THE FOREGOING TRANSCRIPT IS A TRUE AND CORRECT COPY OF
MY SHORTHAND NOTES THEREOF.

Eric Gilliam

CERTIFIED SHORTHAND REPORTER

CERTIFICATE NO. 333P

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TELEPHONE (714) 953-4447

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NOVEMBER 18, 1988

COMMENTS DELIVERED AT THE PUBLIC HEARING ON THE FUTURE OF
SOUTHERN CALIFORNIA TO THE SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS.

My name is Ken Bauer and I reside at 1658 Margate Pl., Thousand Oaks, Ca. At the present time I am the President of our Foxmoor Homeowners Association of 252 homes, A board member of the Westlake Village Joint Board of 39 Homeowner Associations in our area, a member of the Thousand Oaks General Plan Review Committee, Circulation and Open Space Committees, and on a Citizens Advisory Committee for a redevelopment area in Thousand Oaks.

My concerns focus on our finite supply of natural resources of water, air, utilization of land, educational needs and the alleviation of our intolerable roadway traffic and congestion.

I agree with many of the conclusions outlined in your overview document. I especially agree with your conclusion that there is a definite interrelationship between all of the problems and challenges facing all of us in the Southern California area. The growth projections for the future if even close to your projections will have devastating effects on this region if not effectively planned for and managed from this point forward.

It is my opinion that it is extremely important that a priority be placed on land use planning and decision making as we progress toward the year 2000. The scope and nature of the cumulative impacts from individual projects must be given greater consideration than in the past. In far too many instances the decision making bodies simply looked at the site specific impacts and did not plan for or mitigate the cumulative impacts. Future decision making must be influenced by the interrelated aspects of the impacts of land use decisions.

I would like to offer five ideas for your consideration and inclusion into your final document.

1-An emphasis on education and literacy must become a priority goal. To accomplish this I would suggest that future teacher salary adjustments at a level above the rate of inflation should be tied to a raise in the literacy level and test scores on a district by district basis. The increase cost will more than be offset by the additional

tax revenue generated by the new entrants wage earning capacity as they enter the workforce, and their reduction on dependence on the safety net of social services provided.

2-Specific attention to land use planning and the density of projects approved in the future must be emphasized. The over intensification of parcels is the primary contributing factor to all of the adverse impacts we are attempting to work our way out from under. Please keep in mind that neither the Nolan or the First English Supreme court rulings guaranteed a property owner total freedom with respect to the use of property. They simply stated that one could not be denied all economic use. Subsequent court rulings have held that governing agencies could reduce the zoning and resulting density by as much as 90% without being in violation of the law.

3-I would like to encourage the adoption of a tax on parking facilities serving centers of employment. An exemption of 50% would be granted for vehicles with 2 riders and an exemption of 100% would be granted for vehicles with 3 or more riders. The revenue to be used for the encouragement and subsidy of car and van pools and bus use.

4-At the present time the federal government has a provision in the tax code that states that any subsidy granted by a company to employees greater than \$15/month shall cause the entire amount to be included as income to that employee. The collective lobbying of this group with our congressional representatives to increase this limit to \$50 or \$100/month would allow companies to increase a subsidy and the employee not be penalized. The result would be a higher utilization of car and van pools and busses.

5-The final and most significant suggestion I would offer to all of you, would be to link all future new and higher density projects to the LOS levels on our major arterials leading to our freeway network. Replacement projects of the same or lower density would be exempted/not be impacted by this proposal:

- Between now & 1990, ban on projects where LOS=F and >100%.
- 1991-2000, ban on projects where LOS=F.
- 2001-2010, ban on projects where LOS=E or F.
- 2011 and beyond, ban on projects where LOS=D, E or F.

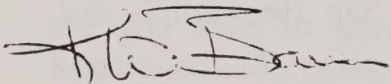
This type of phased approach will address our most serious situations first and will cause the development community to work

together to mitigate the impacts of future new and higher density projects.

I want to thank you for this opportunity to address you and would like to leave you with this story. Just for a minute, picture yourself riding on any train, anywhere in California at a fairly high rate of speed. One of the most critical components of the satisfactory operation of a rail system is the strength, stability and well being of the underlying railroad ties that support and provide basic structure for the rail system to function. Now picture this train being utilized to a higher and higher degree by more and more riders with no provision for maintenance and replacement of the ties as they deteriorate from use over the years. What Happens???.. Well, the system works and works very well for a long time until one or two of the ties simply can not support the load, burden and stress created. The train that has functioned so successfully for so many years becomes derailed and a calamity of tremendous magnitude results with absolutely no warning, but that everyone predicted.

The railroad ties of our life journey are our air and water supply, the sewer systems and solid land fills, our educational process and last but not least our transportation system. We have and will continue to function here in the Southern California Area. However, the underlying base is being utilized and stressed beyond any capacity ever envisioned. If any one much less more than one component of our delicate eco-system fails, Our entire society will be severely impacted and restricted. Our future and our childrens future are in your hands, the decisions you make will for better or worse mold our life style far into the next century.

Thank-you..

A handwritten signature in black ink, appearing to read "Ken Bauer", with a stylized, flowing script.

Ken Bauer
1658 Margate Pl Thousand Oaks, Ca 91361
W-213-486-1268 H-805-497-6117

Ontario Chamber of Commerce
Bill Wren's presentation before the Southern California Association of
Governments planning directors' committee

Nov. 18, 1988
Los Angeles

Good Afternoon. I'm Bill Wren, vice-chairman of the Ontario Chamber of Commerce Governmental Relations Council. I am also representing today the Inland Empire Economic Council, a consortium of Riverside and San Bernardino county businesses.

I thank you for allowing us the opportunity to address you here today on the SCAG growth management and mobility plans.

The task of creating plans to provide a blueprint for future growth in such a diverse and massive region as ours is a monumental one. We want to support and participate with you in this quality planning effort examining the region as a whole. Our objective is for the plan to benefit every county.

We agree with SCAG's plans which call for a job/housing balance to help allieviate much of the traffic and air pollution problems which destroy our quality of life here and we fully endorse an emphasis on the creation of jobs in labor intensive areas.

While we agree with the overall premise of what SCAG is attempting to do, we find that many times the proposed plans do not adequately cover its goals. In addition, we believe the plans fail to consider what the impact will be to outer lying regions like San Bernardino and Riverside counties.

I do have written comments prepared to give to you today but I will briefly touch on some of our general concerns.

I'll begin with the growth management plan. There are three basic issues we've found. Number one, there seems to be an assumption that the growth numbers or projections that are done will NOT be affected by the air quality management plan. We believe that's a big assumption, and one that isn't valid. The air quality plan calls for specific restrictions on some growth. What will the affect be on jobs when an air quality plan is adopted?

Second, the growth management plan never gives you a sense of the urban form it's trying to create. If you read the entire plan you end up wondering what SCAG is trying to accomplish? A few paragraphs and some maps outlining what the region is supposed to look like will help the public understand what the urban form of the future is proposed to be.

Lastly, the plan assumes it can legislate changes in people's behaviors by creating incentives or penalties. We tend to disagree with that assumption. The plan assumes that after these incentives are in place, people will behave accordingly. The environmental impact report for the growth management plan underplays the impact these plans will have on our lifestyles. The individual impact needs to be defined more clearly for all to understand.

Between both plans -- the growth management and mobility -- the way the policies are arranged are not necessarily job/housing inducing. Nor are they necessarily feasible. The management plan's appendix is nothing more than a "wish list," explaining ways to obtain a job/housing balance. There's a menu of possible action, but no adopted list showing this is what needs to happen.

Basically, a series of measures have been used -- measures I should add, which are based on old trends. You have identified the advantages of each measure and have not looked at the impact of how these measures would work together. For instance, the mobility plan suggests that staggered work hours, telecommuting and ridesharing programs be instituted. If you have 20 percent of your employees working at home, and 60 percent working odd hours, how are you able to accomplish the ridesharing quotas mandated by Regulation 15, particularly in firms as small as 25 employees.

Let me focus on the job/housing balance issue. The plan ought to emphasize the creation of jobs where workers live rather than artificially inducing housing back into existing commercial areas. Especially for Western San Bernardino County, the plan isn't specific enough as to how jobs will be induced. You should be drawing industry out there to balance our growth. In Los Angeles and Orange County, the plan calls for adding 50 jobs for every 100 new residents. In Riverside and San Bernardino counties, on the other hand, the plan calls for creating 33 jobs for every 100 people. The

net result is that we will add more people in the outer lying regions that will have to commute to work.

The plan emphasizes the wrong side of the job/housing equation. Rather than emphasizing the creation of jobs in outerlying regions where people already live because the land is less expensive, the plan attempts to constrain housing in these regions. By trying to force housing unto the more expensive land in our region, it will only increase the cost of housing and further reduce the supply of those homes which provide for low and moderate incomes.

Another fault we found in the plans is the lack of consistency between growth management, mobility and air management policies. We have identified many of these inconsistencies in our written comments. For example, the growth management plan calls for facilitating the movement of businesses and mentions offset requirements. The air management plan, on the other hand, makes it awkward to move certain businesses from one area to another. SCAG's plan literally disagrees with the AQMP.

There is no quanifiable relationship between the creation of a job/housing plan and the mobility plan. The plans beg for consistency. Comments in the mobility plan should directly collaborate with the growth management and vice versa.

And they beg for an eye towards the entire region. For instance, in the mobility plan under aviation policies, there is no mention of ground access improvements for Ontario International Airport, used by five million passengers a year. The plans discuss improvement options for Los Angeles, Burbank and Orange County airports, but no priority is given to Ontario.

In closing, SCAG is developing plans that will change the lifestyle of everyone in Southern California without further acknowledging the acceptance of that change to the individual.

In addition, both the environmental impact reports and the plans themselves seriously underplay the economic impact on the area. The key to implementing a job/housing balance is to allow the market place to drive the program forward. You don't allow a free market system to follow if you enforce penalties or constraints. Strong incentives need to be given to drive the market place to take advantage of improved economics. Only then will you see your program implemented.

FRANCISCO X. GOMEZ
FRED J. FUJIOKA
LESLIE K. FURUKAWA

LAW OFFICES
GOMEZ, FUJIOKA & FURUKAWA

911 WILSHIRE BOULEVARD, SUITE 1070
LOS ANGELES, CALIFORNIA 90017

TELEPHONE (213) 629-2238
TELEX 678313 • AMLEX 911 USA
CABLE ADDRESS IMMTEX
TELECOPIER (213) 623-3825

November 18, 1988

Re: Regional Mobility Plan Draft Environmental
Impact Report

Good Afternoon. My name is Fred Fujioka. I am an attorney in private practice in Los Angeles and I am a member of the Minority Coalition for Responsible Growth. I am in-coming President of the Japanese American Bar Association.

I would like to express my appreciation for this opportunity to comment on the Draft Growth Management Plan (GMP) and EIR.

The project proposes the concept of Jobs/Housing Balance as a tool to be shaped to reduce the negative impacts of commuting. Jobs/Housing Balance would redirect growth as a primary tool. Twelve percent of the future growth in employment would be diverted from job-rich areas; where concentrations of minority populations are highest and where employment needs are most severe, (i.e. unemployment is high), to job poor areas where outcommuting is projected to grow the most.

Understood in its simplest form Jobs/Housing Balance proposes that opportunities must be enhanced for people to live near their places of employment, or, vice-versa. We have no quarrel with this proposal, in fact we support it. However, we are concerned that the translation of the concept into reality be guided by a process that indeed solves the problem without worsening others.

Thus, the design of the mechanism is critical. The action to solve the commute problem could have the unintended result of exacerbating the unemployment problem in areas with particularly difficult to meet employment needs. The minority population could suffer from decreased employment opportunities and those entrepreneurs who might wish to create employment opportunities for the population most in need could have their market adversely affected by a poorly designed Jobs/Housing Balance program.

Our second concern is that the Growth Management Plan contains potential massive impacts and stringent, sophisticated "cutting-edge" mitigation actions. The staff is to be commended for its thorough job in this regard. Yet, if we accept that these analysis are accurate and that the mitigation actions are reasonable and prudent, the effort still falls short.

Most of the actions recommended as mitigation measures require no commitment from those who have the means and authority to move the actions forward. Obtaining that commitment is the key fulfillment of the GMP as well as the other SCAG plans currently under review, Air Quality, Mobility and Housing that are based on its findings.

Thus, the real matter before us as citizens of the region is the mix of political and economic forces, both public and private, that must be forged anew if the management of the region's growth is to be achieved.

Clearly, individuals, jurisdictions, and businesses acting alone will prove inadequate no matter the degree or quality of commitment to mitigating the impacts of the plan. What is required is something that does not now exist.

While we have all grown accustomed to our current state, county, local government design of governance, we must now be willing to consider, in the face of the gross regional impacts outlined, a new approach to coping with our problems.

In conclusion, the political forum in which future decisions are made on matters as important as those discussed in the GMP must be inclusive of all interests, including those of the ethnic minorities if it is to be credible and productive.

Thank you.



421 N. EUCLID AVENUE • P.O. BOX 31 • ONTARIO, CA 91761 • (714) 984-2458

Ontario Chamber of Commerce
Comments on the SCAG Growth Management Plan, the Regional
Mobility Plan and the Mobility Plan's EIR

Submitted November 18, 1988

GROWTH MANAGEMENT PLAN

First off, are the regional job growth projections reasonable overall in light of the AQMP?

I-2: a key caveat...type of job with price of housing.

I-4, IV-5: Is there consistency with the regional housing needs assessment (RHNA) and the growth management plan (GMP)? How will the revision to the GMP be incorporated into RHNA?

II-9: Does the period 1970-84 constitute a valid time upon which to base the Baseline projection? Are the trends valid?

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IV-5: There needs to be a clear tie between policies two and three; is policy six inconsistent with jobs/housing balance intent? We question the validity of policy seven.

V-1: Question the validity of growth control contingency; and the consistency with the AQMP, especially in the final finding

VI-6: Given the trends of the last few years, is it reasonable to assume that emerging futures will result in fewer jobs than the 1970-84 trend?

VII-5: Question how reasonable for the West Valley.

VIII-2,3: There's no plan in this plan--What measures will be taken/required? Where's the relationship to the appendices?

VIII-4,5,6: It's impossible to determine the consistency of individual projects with long-term subregional projections; needs clear incentives for locating jobs in housing-rich regions and clear requirements for comparable affordable housing in job-rich areas.

A1-1: How do fees get exchanged between regions and agencies?

A1-2: not workable; different agencies within a subregion will have very different ratios (third paragraph)

A1-3: enterprise zone concept could be undone by AQMP

A1-4: see 4(b) and 4(e)!!!

A1-6: #11 needs clear tie to cost of housing versus type of jobs

A1-7: #13 would not work to achieve jobs/housing balance; inject irrelevant consideration into "home rule" issue

A1-7: #15 strongly support!!!

A1-7: #16 might contribute to continuation of decline

A2-3,4: A(2) -- some cities would simply not fit into regional plan based on type of vacant land

A2-4,5: A(3) is not acceptable given political makeup of SCAG

A2-7: A(5) -- you cannot just increase and decrease densities without strong housing market considerations

A2-12: C(1) -- it's difficult to establish targets on an agency-by-agency basis without a clear understanding of local values and appropriate land uses, and it's difficult to administer.

A2-14: five is not acceptable

MOBILITY PLAN

IV-4: Policies two and seven aren't consistent with the needs of the poor and elderly. And the final policy -- endorsing a maglev train. Why would rail as an alternative to air travel improve mobility?

IV-6: Both policies need emphasis, especially in relation to previous policy.

V-5,6: Question the consistency of alternate work week and telecommuting with ridesharing

V-8: Video school? home shopping? -- question the social implications

V-9: trip reductions plans for multi-tenant buildings -- is it consistent with jobs/housing balance? 25 employees is very small for enforcement of Rule XV

V-12: HOV lanes should not reduce existing number of available lanes; why signal mitigation districts only for Riverside County?

In addition to more buses, additional operating subsidies must be found.

V-28: Given the existing commute problems and funding limits, what is the real priority of an Los Angeles to San Diego or Los Angeles to Santa Barbara rail?

V-34,36: Should specifically study regional transportation benefits of expanding Ontario International Airport

V-36: Why is there no emphasis on Ontario airport's ground access improvement?

V-41: What will the establishment of "truck delivery zones" mean?

V-43: Why move trucks to off-peak in all areas and in all directions?

V-51: Improvement of SR 71 should be a shorter-term priority

REGIONAL MOBILITY PLAN -- ENVIRONMENTAL IMPACT REPORT

How do modified work hours increase productivity? The conclusion at the end of page 121 is not supportable in term of business efficiency!

Page 123: Riverside and San Bernardino counties will experience higher costs.

Page 124: Transit fare structures which favor elderly and handicapped in absence of outside subsidies will discourage transit for home-work commute.

Page 138: West San Bernardino Valley is not identified as gaining employees from job/housing policies -- that's inconsistent with the GMP.

143, 144: Are lower operating costs a valid conclusion when considering higher gas taxes and especially when considering that jobs/housing balance is aimed at new jobs and new housing?

147: There could be a decrease in efficiency of operation due to greater need for management overhead; loss of comraderie and esprit-de-corps; less control of ongoing work efforts

148: Improved communication with the East Coast is only true if workers come earlier; reduced congestion on elevators and plant

gates is superfluous and is indicative of the self-serving nature of the EIR.

149: A significant BENEFICIAL economic impact?? Facilitate movement of goods???

152: J and L understate impacts

(The Ontario Chamber of Commerce was assisted by consultant Lloyd Zola, of the Planning Network, 2940 East "G" St., #105, Ontario, CA, 91764, in preparing the written and verbal comments presented to SCAG)

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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

1540 ALCAZAR STREET
LOS ANGELES, CALIFORNIA 90033
Telephone: (213) 226-8111

THOMAS A. TIDEMANSON, Director
WYNN L. SMITH, Chief Deputy Director
CECIL E. BUGH, Assistant Director
JAMES L. EASTON, Assistant Director

ADDRESS ALL CORRESPONDENCE TO
P.O. BOX 4089
LOS ANGELES, CALIFORNIA 90051

IN REPLY, PLEASE
REFER TO FILE

19.60

July 7, 1986

Ms. Doris L. Bradshaw
19044 Santa Rita Street
Tarzana, CA 91356

Dear Ms. Bradshaw:

LOS ANGELES RIVER-SEPULVEDA FLOOD CONTROL BASIN

Supervisor Hahn asked me to respond to your letter of May 12, 1986, concerning adequacy of the Sepulveda Flood Control Basin and the Los Angeles River.

The Los Angeles River and Sepulveda Dam were designed and constructed by the U.S. Army Corps of Engineers. The dam is operated by the Corps of Engineers. Maintenance of the Los Angeles River downstream of the dam to approximately Lankershim Boulevard is the responsibility of this Department.

Several years ago, we became concerned, as you are, of the adequacy of the Los Angeles River system to handle a large storm event since the design of this system was based upon population projections made many years ago. Following World War II, the San Fernando Valley experienced explosive growth with much greater development than had been originally anticipated when the system was designed. This development has resulted in greater amounts of storm runoff reaching the Los Angeles River more quickly.

The Corps of Engineers, in response to our concerns, has been studying the entire flood control system in the Los Angeles drainage area. The preliminary results of the study will be available later this year. Current discussions with the Corps of Engineers indicate that the Los Angeles River may not have capacity to carry all runoff from a major storm event. Once the analysis is complete, the most feasible methods of upgrading the Los Angeles River system will have to be identified and a financing plan developed. We expect that we will need to look to the Federal government for funds as reconstruction or modification of the system will be very costly.



South Coast
AIR QUALITY MANAGEMENT DISTRICT

9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

August 1, 1988

Ms. Doris L Bradshaw
19044 Santa Rita St.
Tarzana, CA 91356

Dear Ms. Bradshaw:

Thank you for your letter of July 19, 1988, in which you shared some material on the Sepulveda Basin Recreation Lake project, and requested our comments on the air quality issues. Dr. Lents has asked me to look into the matter. I have reviewed the information you provided and discussed it with my staff. We have the following comments.

The Corps of Engineers was in error, we believe, in not seeking formal coordination with the District. This is especially true because of the non-attainment status of the South Coast Air Basin for federal air quality standards under the provisions of the federal Clean Air Act. The Corps, as a federal agency, must work with local air quality agencies to ensure that federal projects are consistent with the Act. In fact, the Corps did so when it prepared the 1981 EIR/S, excerpts of which you also provided. The District believes that this project could induce adverse air quality impacts, and should have been discussed with us.

Potential air pollutant emissions and air quality impacts should have been re-analyzed and presented to the District for comment. The reliance on the 1981 analysis, which itself relied in part on 1979 air quality data, was not warranted given the changes in air quality, emissions characteristics, and, perhaps, in the scope of the project itself. At the least, a supplemental EIR/S should have been prepared and subjected to the public review process. Air quality impacts could arise from construction activities and vehicle use induced by the new recreation facilities. These impacts are calculable, and the information should be presented. If the emissions exceed the District suggested significance thresholds, then they constitute significant adverse environmental impacts requiring mitigation.



US Army Corps
of Engineers
Los Angeles District

SEPTEMBER 1987

LACDA UPDATE

Los Angeles County Drainage Area
Flood Control Study

DISASTROUS FLOODING COULD RETURN TO LOS ANGELES COUNTY

Residents of the Los Angeles basin have not worried about flooding for almost 50 years. Now, whenever heavy rains fall, residents have abundant cause to worry.

If you live or work near the Los Angeles River in the San Fernando Valley or in downtown Los Angeles, close to Tujunga Wash in the San Fernando Valley, or in the cities of Bellflower, Burbank, Carson, Cerritos, Compton, Downey, Gardena, Glendale, Lakewood, Long Beach, Lynwood, Montebello, Paramount, Pico Rivera, Signal

Hill, South Gate, or Torrance, we want you to know that floods from huge storms could damage you.

And even more monstrous storms could extend the flooded area into the cities of Artesia, Bell, Cudahy, Hawaiian Gardens, Huntington Park, Industry, Maywood, Norwalk, Santa Fe Springs, Vernon, and Whittier.

Why Has the Flood Threat Returned?

From the 1930's through the 1960's, the Corps of Engineers and the Los Angeles County Department of Public Works built a superb flood control system of dams, channels, and storm drains that—to date—has prevented almost \$4 billion in damages.

But, as anyone who lives in the Los Angeles basin knows, development has almost totally replaced the orange groves and open fields of the recent past. Development has paved over porous soil that once soaked up much of the rainfall. The rainfall must go somewhere. Today, it flows rapidly off buildings, over streets and parking lots, and into our flood control drains and channels.

In addition, storm water runoff pouring down from the mountain canyons carries soil and debris that



Flooding destruction on the Los Angeles River, March 1938

settle in the flood control reservoirs, reducing their capacity to hold flood waters.

The existing flood control system is no longer capable of protecting hundreds of thousands of residents from large floods. Some of them are you! The system needs an upgrade. The Corps of Engineers and the Los Angeles County Department of Public Works are now planning to improve the flood control system that you depend on.

Public Involvement Needed in Finding Acceptable Solutions

A whole range of solutions are possible: modifying existing dams, building new ones, improving river channels, reconstructing river bridges that now restrict the flow of flood water, and adding new flood water diversion channels. You may have other suggestions.

Continued, next page

Continued from page one

Ultimately, the selection of the best improvements to the flood control system in the Los Angeles basin will depend on what (1) technically solves the flooding problems, (2) is most economical for the expenditure of Federal and local government funds, and (3) satisfies public needs, desires, and concerns.

The Los Angeles District of the U.S. Army Corps of Engineers has prepared this bulletin to explain:

- why flooding is once again a cause for concern among Los Angeles area residents;
- what the Corps of Engineers and the Los Angeles County Department of Public Works are doing to allay the concern; and
- how you can become involved.

You now have an opportunity to tell and discuss with the planners your concerns, ideas, suggestions, and desires through a series of public workshops.

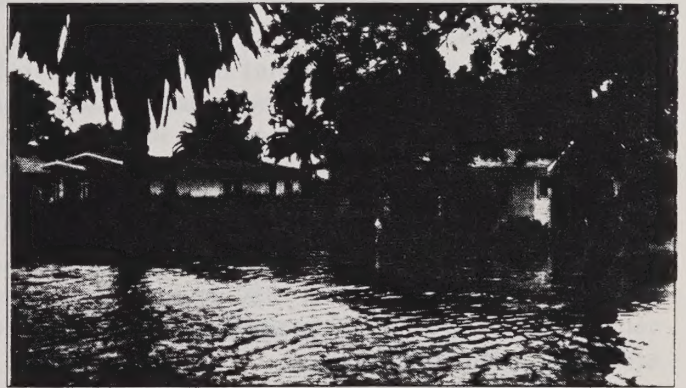
The Corps of Engineers and the Los Angeles County Department of Public Works invite your involvement to work with them to develop a flood control plan that will solve the problem, be economical and affordable, and satisfy your concerns and needs—and those of your neighbors.

YOU CAN MAKE A DIFFERENCE.

Illustrative Photos of March 1938 Flooding and Parts of Today's Flood Control System Close to Capacity



Torrential flood water on the Los Angeles River, 1938



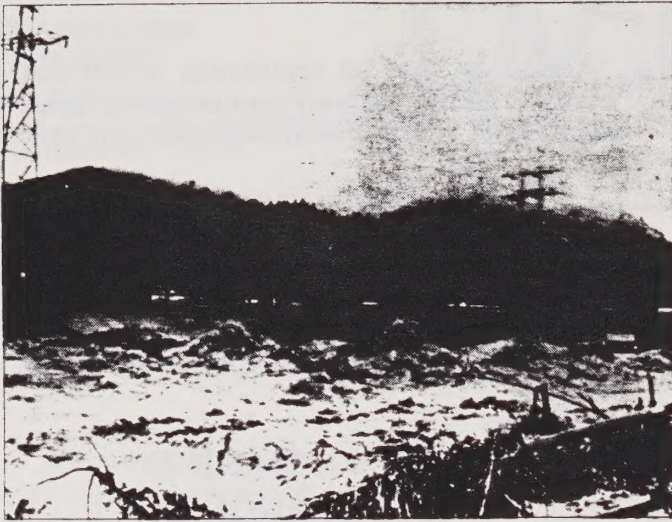
1938 flooding in Compton



Bridge destruction on the Los Angeles River from the flood

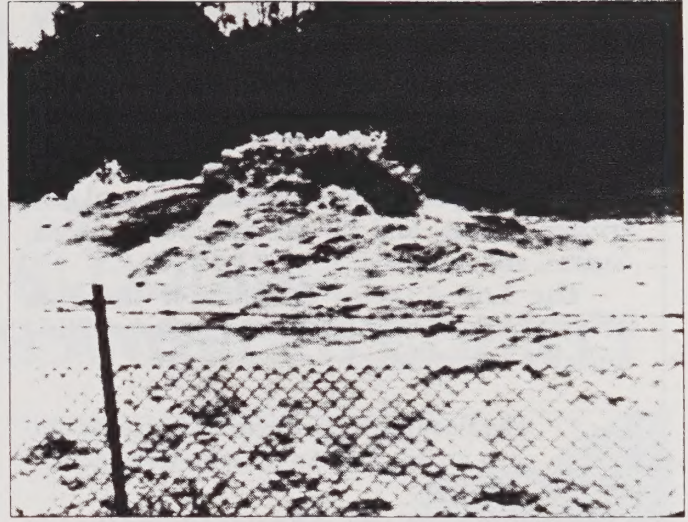


Car immobilized by debris and mud from the 1938 flood



Courtesy of Los Angeles Times

The Los Angeles River channel, looking northwest from just below the Los Feliz Bridge during the January 1969 storm



Los Angeles River at Cedros Avenue in the San Fernando Valley during the December 1980 storm

FLOODING IN LOS ANGELES: THE GROWING THREAT

Major areawide flooding has not concerned residents living in the Los Angeles basin for almost 50 years. Yes, rainstorms have caused local damages sometimes in the millions of dollars. But an impressive system of dams, channels, and storm drains has contained flood water in the rivers, passing it efficiently to the Pacific Ocean. By controlling the runoff from the sizable storms of 1969, 1978, 1980, and 1983, the flood control system in the Los Angeles basin has prevented almost **\$4 billion** in damages.

Cause for concern returned in 1980—at least on the part of flood control engineers. You may recall that six winter storms swept over the Los Angeles basin in rapid succession. The flood control system was doing the job it was designed to do. By the sixth storm, reservoirs had filled, and the channels were passing and containing heavy flows of water, mud, and debris. There was only local flooding in the canyons.

Then, potential trouble arose over the Pacific Ocean: a seventh storm was bearing down on southern California and the flood control system that was close to capacity. The weather forecasters were predicting 2 to 4 inches of new rainfall. Flood control engineers began to question whether their system could handle the additional load. Fortunately, in 1980 at least, the trouble didn't come to pass. The seventh storm never reached the Los Angeles basin.

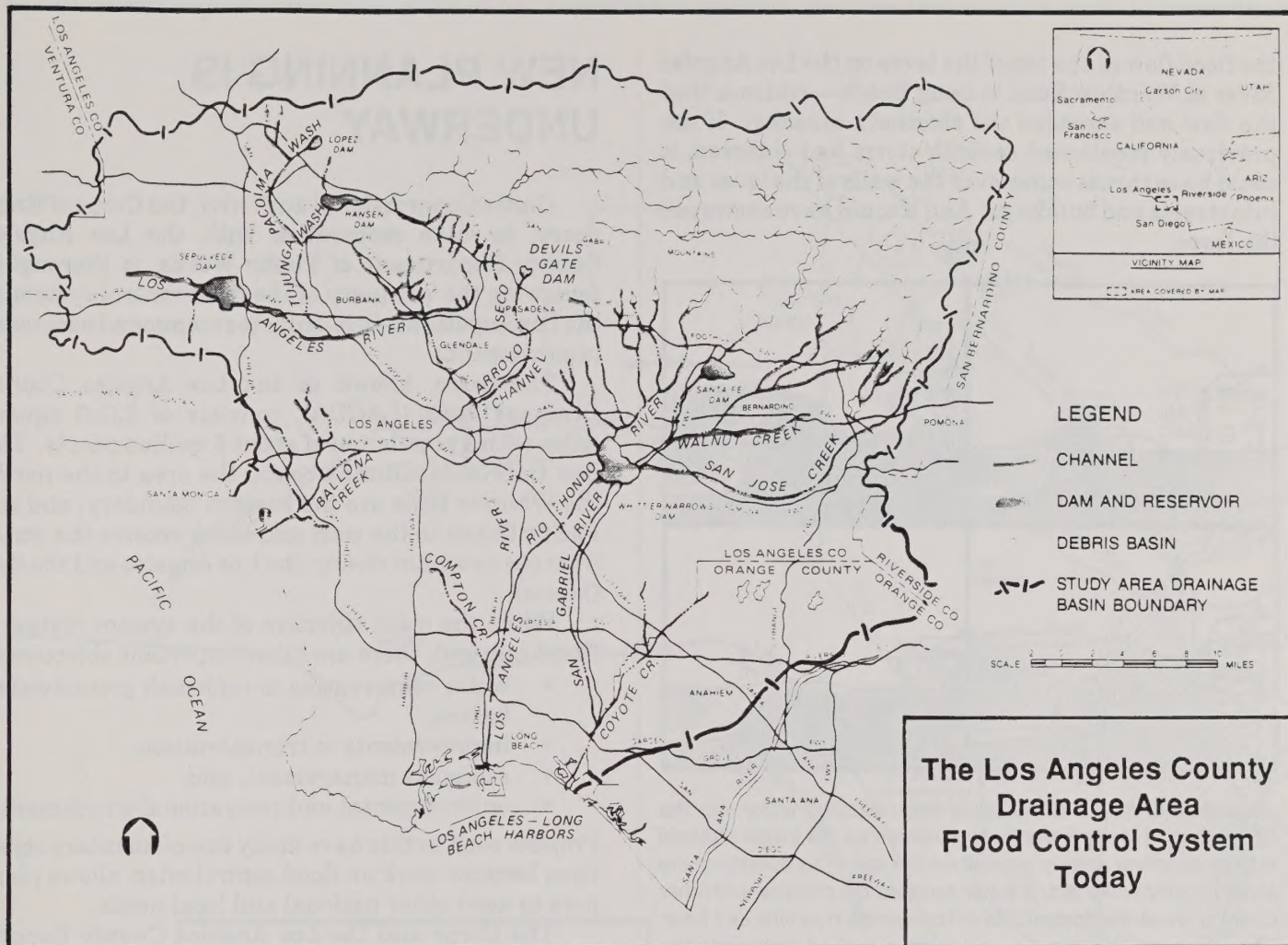
The 1980 series of storms was large, but it was nowhere near as large as storms that could strike the basin. The fact that the flood control system was barely adequate in 1980 suggests that it is no longer adequate to contain all the rainfall from mighty storms.

Early Flooding

Floods are a part of the history of the Los Angeles basin, which is built on an accumulation of sediment that major floods have carried from the mountains.

In the 19th and early 20th centuries, the relatively few people then living in the basin endured periodic flooding. The worst recorded case was in 1868. So much water jumped the banks of the Los Angeles River with such force that it turned the river's course. Before 1868, the river discharged into the ocean at Marina Del Rey. The monstrous flood moved the river about 15 miles south to its present course through Long Beach, flooding everything in between.

In 1916, a large flood inundated thousands of homes and businesses, and the gigantic 1938 flood cut Los Angeles off from the rest of the nation for more than a week. Flood water severed all rail lines and roads leading into the basin, injured hundreds of people, and left thousands homeless.



Destructive flooding hasn't returned to the Los Angeles basin since 1938 because of the construction of one of the most sophisticated, comprehensive flood control systems in the world. It is, in fact, the largest metropolitan flood control system in the United States. Built by the Corps of Engineers and the Los Angeles County Department of Public Works from the late 1930's through the 1960's, the system combines 500 miles of main and tributary channels, 20 flood control dams, and 125 debris basins.

Why the Concern Today?

Evidence has gradually accumulated to show that massive floods could return. Sediment building up behind Hansen Dam in northern San Fernando Valley is reducing the dam's flood water storage capacity. Flows in the rivers have been higher than predicted on numerous occasions. After 50 years of service, channel bottoms and side walls are badly eroded in some spots.

The 1980 storms were perhaps the most vivid evidence of concern. The 500 miles of flood control channel improvements contain about 50 miles of levees, which are manmade embankments that rise as much as 10 to 12 feet above the surrounding land elevation in order to increase channel capacity. Following the 1980 storms, inspectors found debris left from

the flood flow at the top of the levee on the Los Angeles River at Wardlow Road in Long Beach—evidence that the flow had exceeded the channel's capacity. If the previously mentioned seventh storm had occurred, it could have thrust water over the walls of the levee and into streets and buildings. And it could have destroyed the levee.

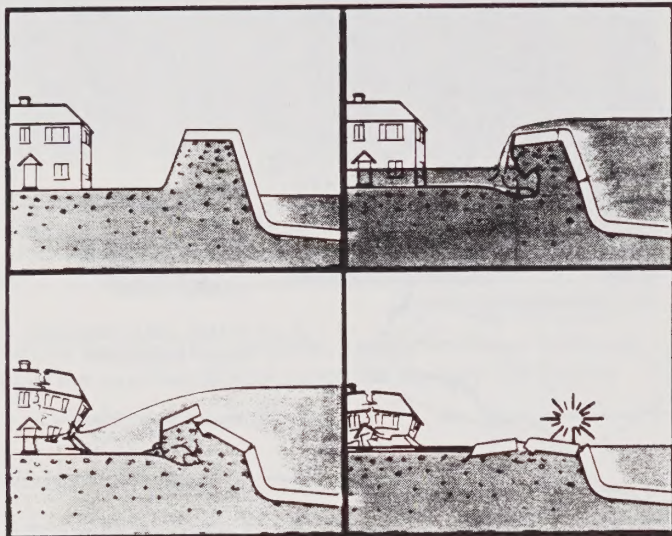


Illustration of how a levee could fail, releasing water into the flood plain. A levee is earthen, protected on the inside channel wall by concrete and by asphalt on the top. The outside of the levee is compacted dirt. If water escapes the channel and flows over the levee, the compacted dirt can erode in as little as 1 hour. The levee would crumble, releasing a wall of water into the surrounding areas. Destructive flooding would have then returned to Los Angeles.

NEW PLANNING IS UNDERWAY

Under Congressional authority, the Corps of Engineers, in close cooperation with the Los Angeles County Department of Public Works, is thoroughly reviewing the adequacy of the flood control system in the Los Angeles basin in order to recommend necessary improvements.

The basin, known as the Los Angeles County Drainage Area (LACDA), consists of 2,000 square miles with a population of about 8 million people. The San Gabriel Mountains bound the area to the north; the Whittier Hills are the eastern boundary; and the Pacific Ocean to the west and south receive the water from the two main rivers: the Los Angeles and the San Gabriel.

While the main objective of the system review is **flood control**, there are other important objectives:

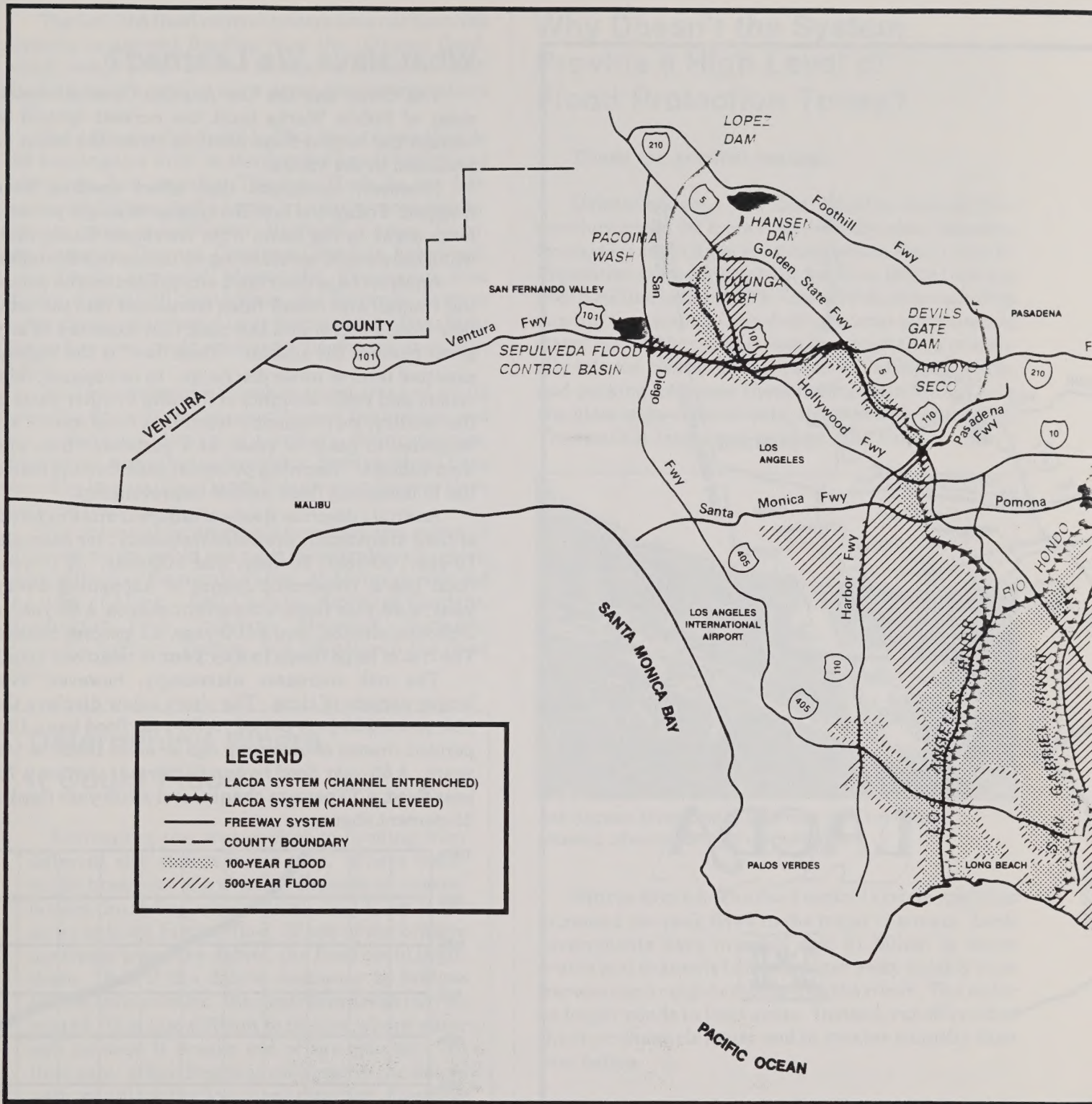
- water conservation to replenish groundwater basins,
- improvements to transportation,
- sediment management, and
- environmental and recreational enrichment.

Projects such as this have many complementary objectives because work on flood control often allows planners to meet other national and local needs.

The Corps and the Los Angeles County Department of Public Works have assembled an impressive team to work on the problems, including hydrologists, hydraulic engineers, economists, design engineers, environmental analysts, biologists, geographers, geologists, and recreational planners.



Staff members of the Corps of Engineers and the Los Angeles County Department of Public Works in a periodic LACDA study coordination meeting



Areas in the Los Angeles County Drainage Area threatened by 100- and 500- year floods

What Have We Learned?

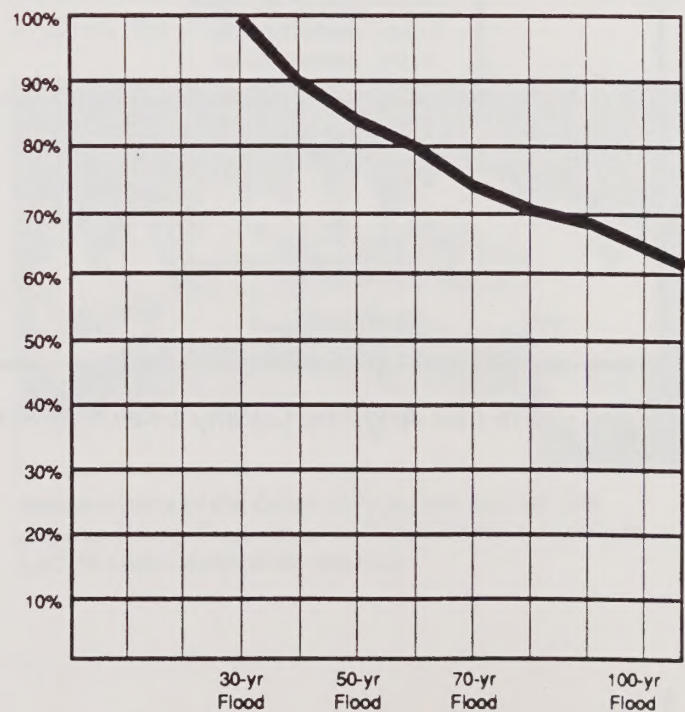
The Corps and the Los Angeles County Department of Public Works built the current system to contain the largest flood likely to strike the basin as predicted in the 1930's.

However, conditions that affect flooding have changed. Today, the LACDA system no longer protects large areas in the basin from enormous floods that, while infrequent, would bring on monstrous damages.

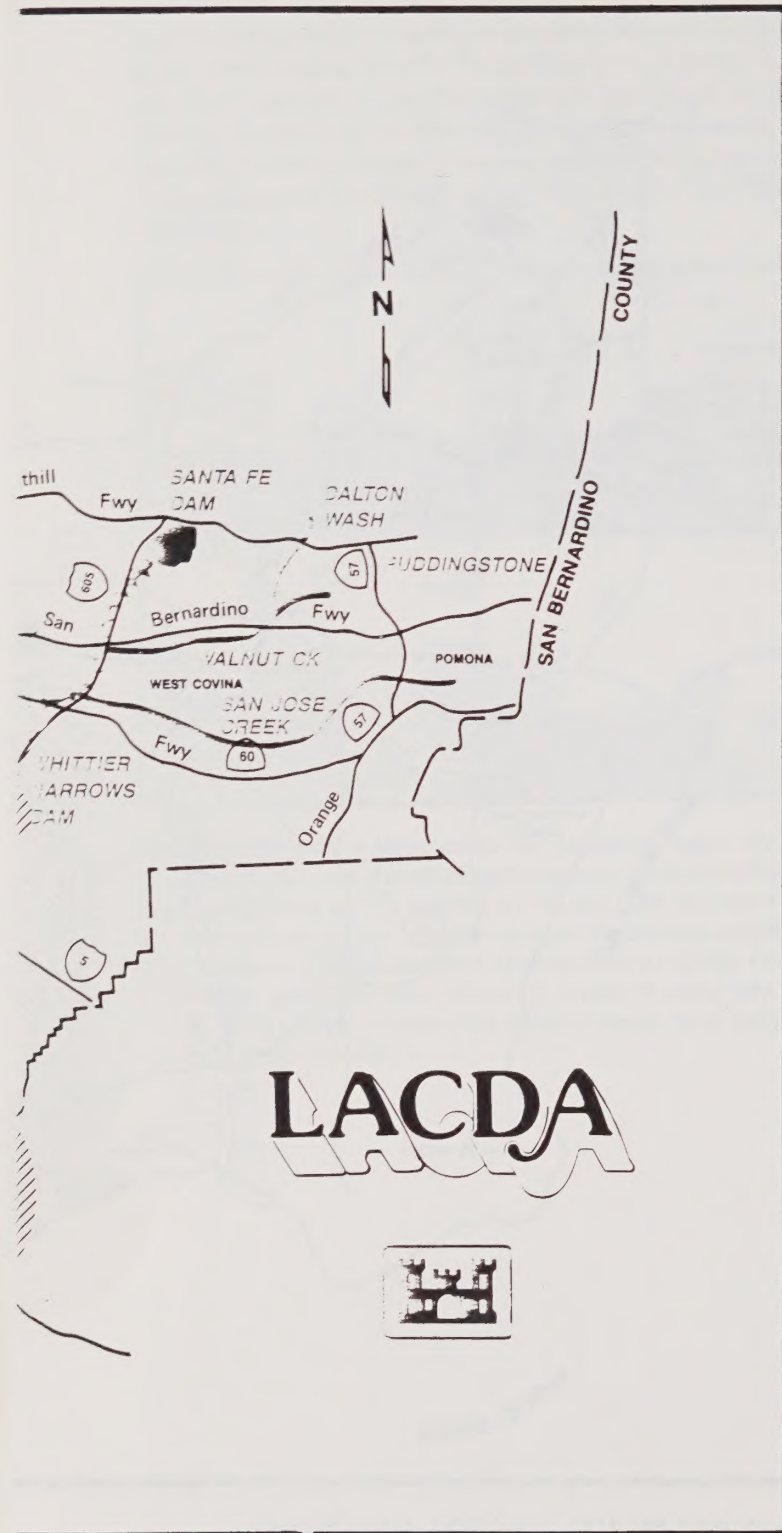
Analysts base their flood size predictions on potential rainfall and runoff rates translated into the total flow from a storm and the peak flow expected at any given point in the system. "Peak flow" is the highest expected level of water discharge. In newspaper, television, and radio accounts of flooding in other parts of the country, we frequently learn that flood waters are "expected to peak, or crest, at a particular time and then subside." Knowing potential peak flows is essential in designing flood control improvements.

Analysts describe floods of different sizes in terms of their statistically projected frequency: for example, 10-year, 20-year, 50-year, and 100-year. A 10-year flood has a 10-percent chance of happening **every year**; a 20-year flood, a 5-percent chance; a 50-year, a 2-percent chance; and a 100-year, a 1-percent chance. The risk of large floods in **any year** is relatively small.

The risk increases alarmingly, however, over longer periods of time. The chart below displays the risk over a 100-year period. A 30-year flood has a 100-percent chance of occurring one or more times in 100 years. A 50-year flood has an 85-percent chance; a 70-year flood, a 75 percent chance; and a 100-year flood, a 65-percent chance.



On the right:
Chances of floods of varying sizes occurring
one or more times in 100 years



The LACDA flood control system does not have the capacity to prevent flooding from the 100-year flood, which would cover about 100 square miles. Indeed, flooding could result in some areas from storms above a 50-year size.

The 100-year flood could affect many areas close to the Los Angeles River in the San Fernando Valley and downtown Los Angeles, Tujunga Wash in the San Fernando Valley, and a large triangular area encompassing parts of Bellflower, Burbank, Carson, Cerritos, Compton, Downey, Gardena, Glendale, Lakewood, Long Beach, Lynwood, Montebello, Paramount, Pico Rivera, Signal Hill, South Gate, and Torrance. In some areas, flood waters could be as deep as 8 to 10 feet. Most areas, however, could experience flooding of about 2 to 4 feet.

Mud and water could weaken structures and would cover the floors of thousands of homes, businesses, and public facilities, damaging furniture, floor coverings, equipment, and other possessions. Roads and rail lines would be impassible. Communication and power lines could be broken.

The potential for an even larger flood also exists. A 500-year storm would add most of central Los Angeles, more of the San Fernando Valley, and large portions of the cities of Artesia, Bell, Cudahy, Hawaiian Gardens, Huntington Park, Industry, Maywood, Norwalk, Santa Fe Springs, Vernon, and Whittier to the flood plain.

Determining Where It Could Flood

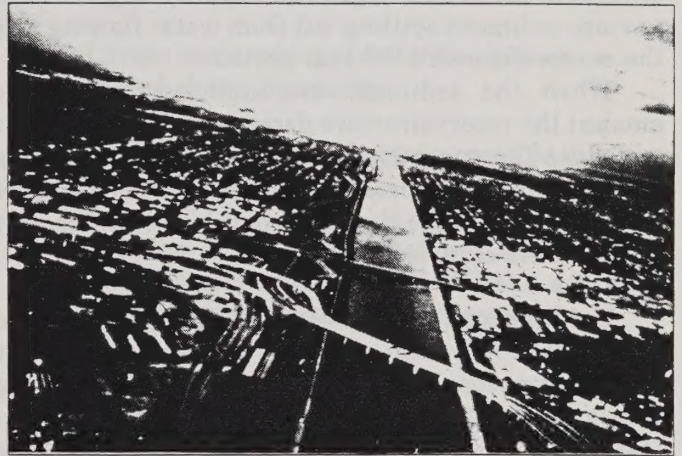
Estimating the area subject to flooding from different size storms is not easy. Where water might break out of a channel depends on several factors, including where debris builds up to restrict or block further flow. If one of the bridges upstream traps the debris, the flood could begin there. But if the debris continues to bridges farther downstream, the upstream areas may be spared. It is also difficult to predict where water will go once it breaks out of the channel. To illustrate: a building that collapses in the flood's path may block the flow in one direction, diverting it in another.

Flood maps, then, are estimates based on the best data and analytical techniques available. While flood maps prepared by different government agencies may not be identical in their flood plain boundaries because of the level of precision necessary for special purposes, they all agree on potential flood sizes.

Why Doesn't the System Provide a High Level of Flood Protection Today?

There are several reasons.

Urbanization. The Los Angeles metropolitan area has grown far more than even the most visionary forecasters could have predicted before World War II. Population soared from about 3 million in the 1930's to over 8 million in the 1980's. Open fields once soaked up much of the rainfall. Only during intense storms would water run off those fields into the streets and eventually into the rivers. Today, however, buildings, roads, and parking lots cover those fields. Rainfall has only one place to go—into streets, storm drains, and rivers. The result is larger and quicker peak flows.



Los Angeles River looking upstream from the harbor, showing urbanization right up to the river

Storm drains. The flood control system itself has increased the peak flows in the major channels. Local governments have invested over \$1 billion in storm drains and channels to carry water away quickly from freeways and neighborhoods into the rivers. The water no longer ponds in local areas. Instead, runoff reaches the river channels faster and in greater quantity than ever before.

Sediment. Sediment is building up in the reservoirs, as engineers expected. The mountains that surround the Los Angeles basin contain easily erodable soils. Heavy rains bring mud and debris down the streams into the reservoirs, where the mud settles and gradually reduces reservoir capacity. Following forest and brush fires that burn thick ground cover in the mountains, heavy rains carry excessive amounts of mud.



Current sediment removal at Hansen Dam in the northern San Fernando Valley

To make room for the sediment, engineers “over-build” flood control dams to provide enough reservoir capacity for storing flood water and sediment. Design criteria in the 1930’s required a capacity large enough to store sediment settling out from water flowing into the reservoirs over a 50-year period.

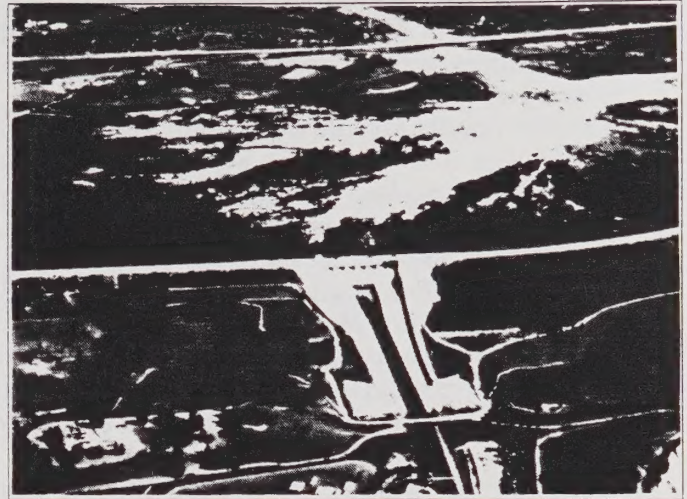
When the sediment eventually surpasses the amount the reservoirs were designed to hold, it begins to reduce the space for flood-water storage. During large storms, dam operators will have to release more water faster into the river channels below, which may not have the capacity to contain it.

Bridges and levees. Bridges may obstruct flood flows. Peak flows can approach the bottoms of many bridges that cross the channels. Bridge pilings can trap debris carried by flood flows, blocking or at least restricting the flow. When the water level reaches the bottom of the bridge deck, the flow backs up and can break out of the channel and/or create enough pressure to undermine the bridge. There are dozens of old bridges that cross the major rivers in the Los Angeles basin.

If peak flows exceed the height of a levee at any point, levee failure is possible—as feared during the 1980 storms.

What Can Be Done to Solve These Problems?

There are many ways to reduce the potential for flood damage. They focus on dams and reservoirs, channels, bridges, and diversion tunnels. Since the LACDA system is so complex, some combination of those measures is likely. The objective of planning for flood control is to develop the plan that does the most cost-beneficial job of reducing flood damages and achieves other important national and local objectives.



Hansen Dam and Reservoir

Dams and Reservoirs. In the Los Angeles area, engineers do not design flood control dams to hold back everything that flows into them during a storm. Here, flood control dams act like a funnel. When high flows enter the reservoir, they are constantly released through the dam’s gated outlets into the downstream channel at a rate that the channel can safely pass. Since there is a maximum release through the outlets, any increase in water flowing into the reservoir means that it will fill faster. Potential reservoir actions include changing current reservoir operations, increasing current reservoir capacity, and/or constructing new reservoirs.

(1) Changing reservoir operations.

Permitting higher and earlier water releases from the dams would increase the capacity of the reservoir for receiving high flows later in a storm.

(2) Increasing current reservoir capacity.

There are 20 dams in today’s LACDA system. Raising any of them, and/or modifying their outlets, would increase reservoir capacity for both flood water and sediment.

(3) New reservoirs.

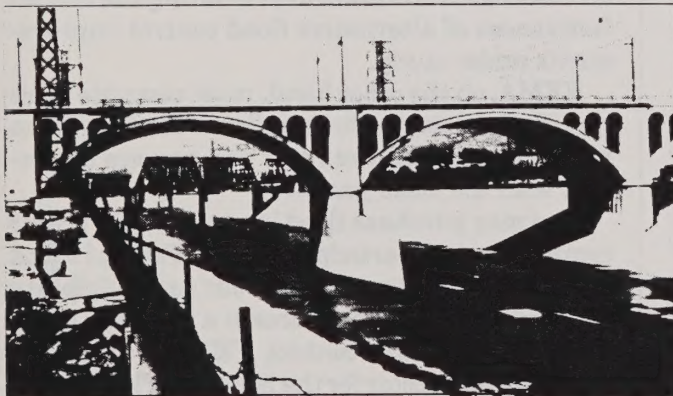
There are several potential sites in mountain canyons for new dams and reservoirs that would add to the flood storage capacity of the LACDA system.

Channels. They can contain the water flowing into them as long as those flows do not exceed their maximum capacity. Alternative ways to increase channel capacity include raising channel walls and levees, changing their configuration from trapezoidal (channel walls slanting outward from a narrower bottom) to rectangular, and widening and deepening. In addition, levee armoring on the outside, while not increasing channel capacity, would eliminate the threat of levee failure that would cause disastrous flooding.



The Los Angeles River Channel at Willow Street

Bridges. Bridge modifications or replacements to eliminate the current restrictions to flood flow would increase channel capacity.



Broadway Street Bridge on the Los Angeles River

Diversion tunnels. Constructing such tunnels would allow the diversion of flows from the rivers. For example, a tunnel from the Los Angeles River north of downtown Los Angeles could carry some flood flows to the ocean.

To Summarize

- Development over the past 50 years has steadily increased flood water runoff.
- New storm drains to serve that development have increased peak flows in the flood control system.
- Sediment flowing into the 20 reservoirs is decreasing their flood control capacity.
- Bridges, by restricting flow and by trapping debris, may cause flood overflows from the channels.
- Levees can erode and fail if flood flows exceed channel capacity.
- Destructive flooding is again possible in the Los Angeles basin.

The Corps of Engineers and the Los Angeles County Department of Public Works are now studying solutions to these problems.

YOUR INVOLVEMENT

Technically, engineers can design just about anything to solve the flooding problem in the Los Angeles basin. But all of the potential measures mentioned in this bulletin would have some effect on life in the basin. Raising dams or constructing new ones requires new land, changing how the community currently uses it. Channel improvements could also require the purchase of more land and could affect aesthetics. Bridge and tunnel construction would, at least for a few years, disrupt transportation.

The important point is that engineering and economic issues are not the only factors in choosing the best plan. Beyond what will technically work, planners ***must listen and pay attention to resident ideas, suggestions, desires, objections, and concerns.***

The Corps of Engineers and the Los Angeles County Department of Public Works have committed themselves to involving you in their planning process:

- How do you see the flooding problem?
- What concerns about potential solutions do you want them to consider?
- Are there other potential flood control measures that you want them to study?
- How do you feel about the potential flood control measures that they have identified?
- How important to you are water conservation, transportation improvements, recreational opportunities, and environmental enhancement?

It is impossible, of course, to reach and involve 8 million people. This bulletin is a start in trying to inform and involve as many people as possible. The Corps of Engineers intends to involve you through a series of public workshops and other meetings to give you the opportunity to contribute to plan development by discussing and answering questions such as those listed above. And the Corps will fully inform you about study progress and problems every step of the way.

The Corps hopes that you will share this bulletin with your friends and neighbors. If you need more copies and/or have any questions about the flooding problem and the study, contact:

Ira Arzt, Project Manager
Los Angeles District
U.S. Army Corps of Engineers
Water Resources Branch
P. O. Box 2711
Los Angeles, CA 90053
(213) 894-5465

If You Live in an Area Subject to Flooding, You May Want Flood Insurance

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which makes insurance available to individuals in communities with a flood hazard if the communities agree to reduce future flood risks (for example, zoning restrictions in the flood plain).

FEMA is now updating the current flood insurance rate maps in the Los Angeles basin. Insurance rates and necessary flood-plain management measures will vary, for different size storms, depending on the depth of the potential flood waters and the boundary of the flood hazard zones.

FEMA expects that, because of increased storm-water runoff and other changing factors, the new flood insurance rate maps (to become effective in 1990) will expand the present flood hazard zones.

It is important to understand that FEMA does *not* use the flood overflow maps developed by the Corps of Engineers (such as the one highlighted on pages 6 and 7 of this bulletin) to determine flood insurance rates. The Corps produces its maps of *average* flood depths for relatively large areas *only* in order to estimate dollar damages—an essential calculation in evaluating the cost effectiveness of alternative flood control improvements under study.

FEMA, on the other hand, must compute more *specific* flood depths for smaller areas in order to make certain that the rates you pay are consistent with the risks you face.

You may purchase flood insurance *only* if your community is a participant in the Federal Flood Insurance Program. To find out your eligibility for flood insurance, or to obtain a free copy of the current rate map, contact FEMA's insurance servicing contractor for the National Flood Insurance Program at (800) 638-6620. You can obtain further information on community participation eligibility, hazard identification mapping, and flood-plain management from:

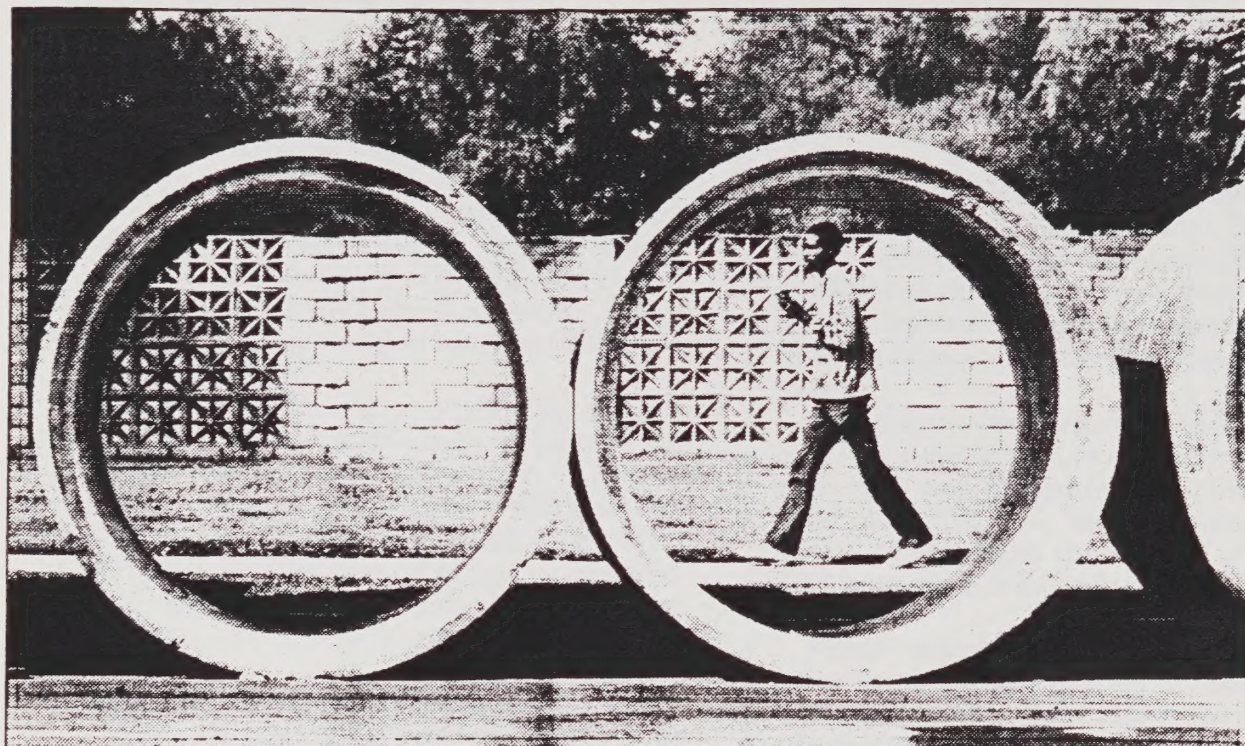
Federal Emergency Management Agency
Region IX
Presidio of San Francisco
Building 105
San Francisco, CA 94129

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VALLEY NEWS



KENNETH K. LAM / Los Angeles Times

Binocular vision—Storm drain pipes on Corbin Avenue focus attention on a passer-by.

Off-Duty Officers Told of Odd Behavior

Gunman Outside Church Slain by Police

By MICHAEL CONNELLY, Times Staff Writer

Two off-duty Los Angeles police officers fatally shot an armed man outside a Sun Valley church service after church members said he was behaving strangely, authorities said Monday.

The shooting occurred about 6 p.m. Sunday on a street outside Grace Community Church in the 13200 block of Roscoe Boulevard. The 39-year-old man killed was not identified pending notification of his family.

Detective Damon Loomis, 47, and Officer Shelley Gale, 36, were attending the service when they overheard church members tell an usher they had seen a man with a gun loitering outside the rear of the church, police said.

"He was doing things normal people don't do," Sgt. Sid Nuckles, of the Police Department's officer involved shootings squad, said of the man.

"He was running around talking to no one in particular, talking to himself, jumping around, acting

strangely. He was not holding the gun," Nuckles said.

Church members told the two officers that the gun was in the man's rear waistband or back pocket, Nuckles said.

When Loomis and Gale went outside, they spotted the man sitting in a car parked on Cantara Street at the rear of the church parking lot, police said. The two officers, who were not in uniform, approached the car and identified themselves as police officers, displaying their badges, police said.

"The suspect, while still seated in the driver's seat in the car, withdrew and pointed a loaded .22-caliber revolver at Detective Loomis," said Officer Joe Mariani, a department spokesman.

"The detective believed he was about to be shot by the suspect and fired two rounds" at the man in the car, Mariani said. Police said Gale also fired two shots into the car.

"The suspect was apparently unaffected from the gunfire and still attempted to point his gun at Detective Loomis," Mariani said.

al three times. The man in the car did not fire his gun. He was hit in the face and upper torso by the officers' shots and died at the scene.

Police said Monday they could find no explanation for the man's behavior. There was no evidence of drugs in the car, and detectives discovered no record that the man had mental problems, Nuckles said.

An autopsy to be performed later this week will determine if the man was using drugs at the time of the shooting, Nuckles said.

The officer involved shootings squad investigates all shootings involving police officers and turns its findings over to a grand jury.

Man Drowns as Suspect in 4 Slayings

Prosecutors charged Monday a man arrested in the murder of four people in the View Terrace in August.

Deputy Dist. Atty. Gen. Jenkins said police have sufficient evidence to charge Nash Newbil, 52, with the View Terrace with being a suspect in the four slayings. County Newbil owned a block of Wheeler, where the killings occurred, said rock cocaine was found from the home.

Prosecutors filed charges against a fifth man Monday. Jenkins said filed against Le Roy Sylmar. Wheeler police last week in the Sept. 25 murder of Anderson, 24, in a race.

Also charged with quadruple slaying a man, 30, and Levi of Pacoima. Antelope Lake View Terrace being an accessory.

The defendant in the Aug. 28 murder of Anderson English, Calif.; her 28-month-old son, Chemise; and James Brown and James Brown.

Wheeler, Bryant would face the charges if convicted, are the attempted murder of English, the victim's son. The boy received injuries during the shooting.

According to the defendant and Armstrong defendants in a 1988 murder charge dismissed and guilty to voluntary

3-186

Reflections

Perry Riddle is on vacation.

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RESPONSES TO THE REAL TESTIMONY RECEIVED AT THE
PUBLIC HEARING ON NOVEMBER 18, 1988

STATE OF CALIFORNIA

IN SENATE, FEBRUARY 1, 1989

COMMISSION ON THE STATUS OF THE CALIFORNIA

1. The Commission on the Status of the California
Indian Tribes was organized in 1975 to study the
status of the California Indian Tribes and to
make recommendations to the Legislature. The
Commission has held several public hearings and
has received many suggestions from the public.
The Commission has also conducted extensive
research into the problems of the California
Indian Tribes.

THIS CONCLUDES THE NOVEMBER 18TH, 1988 PUBLIC HEARING TRANSCRIPT.

IN WITNESS WHEREOF, I have hereunto set my hand
and the seal of the State of California at
Sacramento, California, this 1st day of February, 1989.

Page 12

2. The Commission on the Status of the California
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Page 13

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The Commission has also conducted extensive
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Indian Tribes.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE
DEIR PUBLIC HEARING ON NOVEMBER 18, 1988

105. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
106. This comment does not specifically identify those impact areas that need to be defined more clearly; therefore, no specific response can be given.

CHAPTER 4. ERRATA

This chapter shows all changes to the DEIR with the exception of Table 3-1, which is shown in Chapter 2. Text in standard print is original text from the DEIR; text in italics is added language; text that has been overstruck is deleted language. The chapters are ordered as they appear in the DEIR. References to paragraphs refer to complete paragraphs, unless otherwise noted.

Page 2-2

On Figure 2-2, replace the words "Chino Basin" with "West San Bernardino Valley."

Page 3-6

Amend the sixth paragraph, third line, as follows:

". . . of natural habitat and endangered species. Other nonrenewable resources, such as water, would also be committed to use."

Page 4-3

Amend the fourth column header of Table 4-1 as follows:

"Increase, ~~1984~~ 1980-2010"

Page 4-4

Add the following language to the first paragraph, sixth line:

". . . Association of Governments 1988h). From 1984 to 1988, the number of housing units increased by approximately 430,000 (2.3 percent per year), growing to 5.08 million."

Add the following language to the third paragraph, seventh line:

". . . Association of Governments 1987). From 1984 to 1988, however, household size in the region increased from 2.66 to 2.70."

Page 4-9

Add the following language to the fourth paragraph, fifth line:

". . . estimate prepared by SCAG). DOF's projection was derived by converging ethnic fertility rates to the White fertility rate by 2010. SCAG projections. . . ."

Page 4-11

Amend the sixth paragraph, first line, as follows:

~~"Ninety-five~~ *Approximately eighty* percent of all additional households. . . ."

Page 4-18

Amend the second header as follows:

"Impact: ~~Continuing~~ *Increased* Jobs/Housing Imbalance over 1984
Among Subregions and Counties"

Page 4-19

Amend the first paragraph, second line, as follows:

". . . with the exception of *Orange and* Los Angeles ~~and Imperial~~
Counties. . . ."

Amend the second paragraph, fourth line, as follows:

". . . (moving 25 percent further from the *1984* regional average in
2010)."

Amend the fourth paragraph, second line, as follows:

~~" . . . subareas relative to 1984, a J/H imbalance would still exist in
2010 the imbalance would increase regionwide relative to 1984. This
conclusion is based on weighting the figures in Table 2-10 ("Change
in Jobs/Housing Ratios, 1984-2010, as a Percentage of the Change
Required to Achieve the 2010 Regional Jobs/Housing Ratio") by the
average of employment and housing growth. Because Los Angeles
and Orange Counties and the urbanized subregion are projected to
experience the greatest amount of employment and housing growth,
their negative effect on J/H ratios weighs more heavily. Therefore,
the effects of a J/H imbalance, such as increased commuting dis-
tances and traffic congestion, degraded air quality, increased ener-
gy consumption, and reduced close-in employment opportunities.
This impact. . . ."~~

Page 4-24

Amend the third paragraph, first line, as follows:

~~"For the purposes of this analysis, it is assumed that the~~ *The*
ethnic and age distribution of the region's population in 2010 under
GMA-Low would be the same as *similar to* the forecast by SCAG for
GMA-1. . . ."

Page 5-3

Amend the second bullet, first line, as follows:

"o Local jurisdictions should ~~limit~~ *consider limiting* the extent and. . . ."

Page 6-1

Amend the third paragraph, second line, by adding the following after the first sentence:

"For the entire region, dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1."

Amend the fourth paragraph, third line, as follows:

". . .by-2000 slightly over time as water use in areas of origin in northern California increases- and Central Valley Project (CVP) contractual obligations increase. ;--and--users--with--prior--rights--to northern-California-water-supplies-exercise-those-rights (Southern California Association of Governments 1987; Soltz pers. comm.)."

Page 6-2

Amend the first paragraph, fourth line, as follows:

"The Metropolitan Water District of Southern California's (MWD's) annual ~~apportionment~~ dependable supply of Colorado River water would be reduced by approximately 620,000-million-acre-feet--(MAF) (55-percent)-from-1.21-MAF-TO-0.55-MAF 690,000 acre-feet (AF) (59 percent) from 1.16 MAF to 0.47 MAF as a result of the CAP and increased water use by upper Colorado River basin states. Annual ~~apportionments to the Imperial Irrigation District, Coachella Valley Water District, and Palo Verde Irrigation District, which currently total 300,000 AF, would be eliminated by operation of the CAP.~~ Based on historic diversions of Colorado River water, the Coachella Valley Water District's loss in dependable supplies could be as much as 238,000 AF per year (California Department of Water Resources 1987; Soltz pers. comm.)."

Amend the second paragraph, first line, as follows:

"State Water Project. If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. ~~Of the 1.86 MAF in maximum SWP entitlements held by contractors in the MWD service area for 1988, a total of 1.08 MAF in approved orders were processed (58 percent of maximum entitlements) due to facilities constraints. Maximum entitlements to these contractors are scheduled to increase to 2.0115 MAF per year in 1990 (Horne pers. comm.).~~ The total maximum SWP entitlements held by contractors south of the Tehachapis for

1988 was 2.213 MAF, including 1.86 MAF for the MWD. In 1988, all contractors south of the Tehachapis requested 1.188 MAF, including 1.03 MAF for the MWD. All requests were approved. Until the East Branch of the California Aqueduct is enlarged in 1992, the MWD can only import about 1.4 MAF from the SWP; however, the MWD's maximum annual entitlement will increase to 2.0115 MAF in 1990 (Soltz pers. comm.)."

Amend the third paragraph, fifth line, as follows:

"Statewide estimates indicate that annual net ~~use of~~ firm SWP supplies will increase by 800,000 AF (33 percent) from 1985 to 2010, increasing from 2.4 MAF to 3.2 MAF. The SWP would not be able to meet ~~this~~ the increased demand of 3.6 MAF in 2010 in most years with existing facilities, but could do so in approximately 4 of every 5 years, assuming that existing facilities are ~~expanded~~ augmented as planned (California Department of Water Resources 1987; Soltz pers. comm.)."

Amend the fifth paragraph, first line, as follows:

"*Colorado River*. Because of an increase in the use of entitlements by users in Arizona, the dependable supply of Colorado River water allocated to the MWD has been reduced from ~~1.212~~ 1.16 MAF to ~~0.55~~ 0.47 MAF per year ~~and is conservatively projected at 0.47 MAF per year by MWD staff after deductions for rights held by others and system losses~~ (Chan and Soltz pers. comms.). The Imperial Irrigation District, ~~Palos--Verdes~~ Palo Verde Irrigation District, and Coachella Valley Water District hold priority to the first 3.85 MAF of California's 4.4 MAF apportionment of Colorado River water. Strategies for ~~transferring the more efficient~~ use of these supplies from ~~agricultural to urban uses~~ are currently being investigated ~~by the MWD~~."

Page 6-3

Amend the second paragraph, fifth line, as follows:

"About one-third of the water used in that year was derived from groundwater ~~and surface~~ supplies ~~and local sources~~; the remainder was imported from the Colorado River (*through the Colorado River Aqueduct*), ~~through the SWP northern California~~, and the Owens/Mono basins (through the Los Angeles Aqueducts)."

Page 6-4

Table 6-1 should be amended as follows:

Table 6-1. Regional and Subregional Water Supply and Demand Projections in 1984 and 2010
and Under the Proposed Project and Alternatives (2010)

	REGIONAL TOTAL (1984)	REGIONAL TOTAL (2010)	PLAIN SUBREGION (2010)	OUTLYING SUBREGION (2010)
Dependable Supplies (MAF per year)	9.1 7.48	8.3 6.27	3.5 2.60	4.8 4.12
Demand (MAF per year)				
Urban	3.3 3.03	4.9 3.98	3.9 3.07	1.0 0.91
Agriculture	4.7 4.02	4.6 3.94	0.4 0.23	4.2 3.71
Total	8.0 7.06	9.5 7.92	4.3 3.30	5.2 4.62
Projected Surplus (Shortfall) (MAF per year)	1.1 0.42	(1.20)	0.80 (0.70)	0.40 (0.50)
Projected Surplus (Shortfall) as Percentage of Total Demand	13.8 5.95	(12.6) (15.15)	(18.6) (21.2)	(7.7) (10.8)

Sources: ~~Southern California Association of Governments (1987); Soltz~~ Froelich pers. comm.

Note: Data is based primarily on information from Water Supplies for the Southern California SWP Service Area - Phase I, (June 1987) and SCAG Baseline growth projections (1987).

Amend the first paragraph as follows:

"The population of the MWD service area has increased from 7.4 million in 1960 to ~~13.6 more than 14~~ million in 1986, which represents approximately half of the state's population (State Water Contractors 1987a, Southern California Association of Governments 1987, *Soltz pers. comm.*)."

Amend the second paragraph, first line, as follows:

"The *MWD's dependable or firm supply is estimated to be MWD holds rights to approximately* approximately 3.37 MAF per year of ~~dependable of firm supply~~, including 1.19 MAF from local sources, 1.14 MAF from the SWP, 0.47 MAF from the Colorado River, 0.42 MAF from the Los Angeles Aqueducts, and 0.15 from wastewater reuse (Chan pers. comm.). Firm or dependable yield is the annual supply expected to be available during periods of below-average precipitation, in accordance with a predetermined schedule of probability. ~~Dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1.~~"

Amend the fourth paragraph, first line, as follows:

"*Other Providers.* Other major water providers include the Imperial Irrigation District, the Coachella Valley Water District, and the *Palo Verde* ~~Palos-Verdes~~ Irrigation District."

Amend the fifth paragraph, third line, as follows:

"Imported supply options include storage of water from existing sources *during wet periods*, use or storage of surplus water from *unused entitlements of Colorado River Water from other lower Colorado River basin states* ~~other states or~~ and agricultural agencies, and predelivery of exchange water to *water agencies in the Coachella Valley irrigation districts.*"

Amend the sixth paragraph, first line, as follows:

"The MWD *is considering storage* ~~has proposed storage of up to 3.0-MAF of surplus water. . . .~~"

Amend the third paragraph, first line, as follows:

"*Surface water sources.* ~~Improper~~ Operation. . . ."

Page 6-9

Amend the sixth paragraph, first line, as follows:

"Impact: Regional Water Supply Shortfall of 1.2 Million Acre-Feet in 2010"

Amend the sixth paragraph by adding the following:

"However, studies indicate that a projected decline in residential per capita water use may be offset by an increase in commercial use rates (Soltz pers. comm.)."

Page 6-10

Amend the first paragraph, third line, as follows:

". . . would increase regional water use by approximately 1.5 0:86 MAF (18.8 12:2 percent) between 1984 and 2010. Urban demand would increase by 1.6 0:95 MAF (48.5 31:7 percent) and agricultural demand would decrease by 0.1 MAF (2.1 2:0 percent). ~~By 2010, A Agriculture and urban uses~~ within the region would demand approximately 48 percent or regional water consumption in 2010, compared to 59 percent in 1984 ~~the same amount of water~~. Approximately 55 58 percent of regional water demand in 2010 would come from the outlying subregion, based largely on agricultural water use (Froelich pers. comm. ~~Southern California Association of Governments-1987~~)."

Amend the third paragraph, first line, as follows:

"Urban water demand in the MWD service area is projected by MWD DWR. . . ."

Amend the fourth paragraph, first line, as follows:

"During this period, dependable supplies for the SCAG region are expected to decline by 0.8 0:76 MAF (8.8 10:2 percent). These trends would result in a projected shortfall of 1.20 MAF in 2010, with supplies meeting less than 88 85 percent of total demand in that year. . ."

Amend the fifth paragraph, third line, as follows:

". . . where dependable supplies would total 3.5 2:60 MAF (81.4 78:8 percent) of projected demand. Supplies would be expected to meet 92.3 89:2 percent of the demand in outlying areas."

Page 6-11

Amend the second line as follows:

". . . within the MWD service area, including San Diego County (Chan pers. comm.)."

Amend the fourth paragraph as follows:

"The wastewater volume handled by all treatment plants in the region in 1985, 1,660.5 million gallons per day (MGD), represented 87 percent of the estimated collective capacity of those plants. ~~Since peak flows exceed average daily wastewater flows (ADWF) by as much as 25 percent, plants operating at 75 percent capacity often are considered in need of expansion (Southern California Association of Governments 1987).~~ In 1985, ADWF comprised 73 percent of countywide wastewater capacity in Riverside and San Bernardino Counties, 79 percent in Ventura and Imperial Counties, and 90 percent in Los Angeles and Orange Counties (Southern California Association of Governments 1987)."

Amend the fifth paragraph, third line, as follows:

"Table 6-2 identifies districts handling ADWFs in excess of 75-percent capacity. Some of these districts have plans to expand their wastewater treatment facilities, while districts not listed could also experience future shortfalls if they undergo very high levels of growth (Southern California Association of Governments 1987). *It should be noted that some plants operating at or above full capacity are not in need of expansion, since regional wastewater systems (including two such systems operated by the County Sanitation Districts of Los Angeles County) allow flows to bypass some plants and be treated at others (Gratteau pers. comm.).*"

Add the following paragraph after the fifth paragraph:

"Conditions in respective wastewater districts within the region are expected to change, based on projected growth and planned facility capacity expansions in various districts. For the year ending September 1988, for example, ADWF at the San Jose Creek WRP in Los Angeles County was 102 percent of ADWF plant capacity, compared to 82 percent as of 1985; however, the capacity of this plant would increase 60 percent by 1991 based on an expansion proposed by the County Sanitation Districts of Los Angeles County (Gratteau pers. comm.)."

Amend the fourth paragraph as follows:

"As more and more wastewater effluent is generated and enters receiving waters, the level of treatment becomes increasingly important for maintaining water quality. Three larger districts in Los Angeles and Orange Counties discharge into the Pacific Ocean and do not provide full secondary treatment ~~,--the minimum level of treatment required by law.~~ The County Sanitation Districts of Los Angeles County are currently awaiting a decision on their request for an Ocean Discharge Waiver under Section 301(h) of the Federal Clean Water Act. If this is denied, the Districts will be required to expand secondary treatment facilities to match primary treatment capacity without decreasing overall wastewater treatment capacity (Gratteau pers. comm.)."

Amend the third paragraph, third line as follows:

". . .dependable annual supplies at a regional level by 2010 to ~~at least approximately 10 8.0~~ MAF. . ."

Amend the third paragraph, fifth line, as follows:

"- increase SWP yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements (including completion of Delta Pumping Plant, South Delta improvements, North Delta improvements, ~~West North Delta water management, and Delta levee improvements~~, offstream storage programs (including Kern Water Bank, Los Banos Grandes Reservoir, ~~Kellogg/Los Vaqueros Reservoirs~~, and Delta island reservoir storage), CVP programs (including interim water supply acquisition and New Melones Reservoir conjunctive-use program), and other SWP programs (including Cachuma Reservoir enlargement); and implementation of water transfer agreements ~~between agricultural and urban SWP contractors~~. . . ."

"- ~~participate in programs to store~~ ~~store up to 3.0 MAF of~~ surplus water in groundwater basins. . . ."

Page 6-21

Amend the first bullet, first line, as follows:

"o The ~~1974~~ 1979 Areawide Waste Treatment. . . ."

Amend the second bullet, third line, as follows:

" . . . entities ~~should~~ may need to upgrade their facilities. . . ."

Page 6-25

Amend the first paragraph, third line, as follows:

"However, these alternatives are in only limited use in the region today because of or are otherwise constrained by cost, market uncertainties concerning the sale of recyclable materials, the current energy surplus, and air quality concerns associated with the production of energy from solid waste, and lack of public and political support for such measures (Southern California Association of Governments 1987; Gratteau pers. comm.)."

Amend the second paragraph, third line, as follows:

"The shortage of landfill capacity is most acute in urban areas, particularly in Los Angeles County and the valley area of the San Bernardino County, where waste quantities are greatest and where suitable sites for new or expanded landfill sites are most difficult to find. *County Sanitation Districts of Los Angeles County staff report that Los Angeles County will begin to experience a daily shortfall in landfill capacity by 1992 if no expansions, development of new sites, or increased recycling are implemented (Gratteau pers. comm.).* ~~Virtually all of Los Angeles County's permitted landfill capacity for residential and commercial waste could be depleted by the end of 1991 without increase in landfill capacity, according to a 1988 study by the Los Angeles County Sanitation Districts and the City and County of Los Angeles.~~ The five landfills in the valley of San Bernardino County would be depleted by 1994 (Southern California Association of Governments 1988e)."

Amend the fourth paragraph, first line, as follows:

"Regional annual solid waste disposal demand would increase from 19.94 million tons in 1984 to ~~27.73-32.46~~ ~~29.36-29.50~~ million tons in 2010. . . ."

Add the following after the fifth paragraph:

"Based on 1988 Ventura County landfill capacity estimates and 1987 solid waste disposal data prepared by the CWMB, the remaining useful life of existing Ventura County landfills is projected to be 3.0-3.5 years, compared to 4.5 years as indicated in Table 6-6. However, several projects under consideration could increase the useful life of county landfills to 17-18 years. These projects include reactivation of the Bailard landfill, expansion of the Simi Valley landfill, and development of a new Weldon Canyon landfill in western Ventura County (Madden pers. comm.)."

Page 6-28

Amend the fourth paragraph, first line, as follows:

- "o A comprehensive regional solid waste management plan should be developed and implemented by counties within the region, and this plan should include waste reduction, reuse, and recycling programs."

Page 6-33

Amend the fifth paragraph, first line, as follows:

- "o The Southern California Hazardous Waste Management Authority and each of its member counties should adopt and implement hazardous waste management plans that include waste reduction programs ~~the 1989 Regional Hazardous Waste Management Plan.~~"

Page 6-37

Amend the third paragraph, first line, as follows:

"Impact: Demand for *Approximately* 677. . . ."

Page 6-39

Amend the third item beneath the bullet, first line, as follows:

"- build ~~at-least~~ *approximately* 677 new schools. . . ."

Page 6-43

Amend the first paragraph, first line, as follows:

"Impact: Need for ~~at-least~~ *approximately* 11,430. . . ."

Page 6-46

Amend the third paragraph, first line, as follows:

"Impact: need for ~~at-least~~ *approximately* 7,100-10,970. . . ."

Page 6-56

Amend the third paragraph, fifth line, as follows:

"Regional demand was estimated based on household and employee generation rates (*California Energy Commission 1987a* ~~Southern California Association of Governments-1982~~)."

Amend the fourth paragraph, sixth line, as follows:

"Remaining households are served by the San Diego Gas and Electric Company (SDGE) ~~or~~ the Imperial Irrigation District (IID) *and other providers, including municipal electric utilities (e.g., Anaheim, Riverside, and Colton) and independent power producers such as cogenerators (that are being relied upon increasingly to meet future energy supply demand).*"

Page 6-57

Table 6-11 has been revised as follows to reflect more recent energy demand projections. Using CEC generation rate projection and SCAG growth assumption for the proposed project and adjusting for projected demand from other uses, the cumulative regional demand for electricity and natural gas in 2010 is estimated at 136,840 Gwh and 1,161 Bcf (16.4 and 24.2 percent higher than DEIR estimates, respectively).

Table 6-11. Annual Regional Energy Consumption Projections in Base Year and Under Proposed Project and Alternatives (2010)

	Unit of Measurement	Consumption in Base Year	Consumption in 2010	Increase in Consumption (Base Year to 2010)	Percentage of Consumption Increase (Base Year to 2010)
Electricity	Gigawatt-hours (Gwh)	76,100 Gwh (1980)	136,840 Gwh 117,600	60,740 Gwh 41,500	79.8 54.5
Natural gas	Billion cubic feet (Bcf)	675 Bcf (1980)	1,161 Bcf 935	486 Bcf 260	72.0 38.5
Motor fuel	Million gallons (MG)	6,096 MG (1979)	6,346-6,864 MG	250-768 MG	4.1-12.6

Notes: Projections are based on housing, employment, and energy consumption estimates for 1979 and 1980, ~~2007 future~~ generation factors, and ~~2010 2000~~ energy demand projections ~~in previous SCA6 analyses~~ (Southern California Association of Governments 1982; *California Energy Commission 1987, 1988*); 2010 regional housing and employment projections (Southern California Association of Governments 1988); and 2010 vehicle-mile projections. (See Chapter 7). It was assumed that housing units ~~in between 1980 and 2010~~ would demand ~~2,300 5,913~~ Kilowatt-hours (Kwh) of electricity and ~~23,943 51,830~~ cubic feet (cf) of natural gas per unit per year on average. Projections for commercial and industrial uses are based on the ~~projected number of jobs in increase in employees expected by 2010~~, using ~~annual averages of 5,569 Kwh and 13,542 cf per employee for commercial uses and 205,787 cf per employee for industrial uses; it was assumed that 90 percent of all new jobs created in the region between 1980 and 2010 would be classified as commercial; and 10 percent would be classified as industrial; based on employment by sector as described in Chapter 4:~~ 11,170 Kwh and 100,100 cf per job. *California Energy Commission (CEC) data are based on Southern California Edison and Southern California Natural Gas service areas and a range of land uses including street lighting, institutional, and unclassified. A conservative approach (assuming 2 percent annual growth in consumption from 2007 to 2010) was used to extrapolate 2010 electricity and natural gas demand projections. The CEC estimates that consumption of electricity and natural gas will increase at an annual rate of 1.89 and 1.74 percent from 1985 to 2007 and 2009, respectively.*

Sources: *California Energy Commission (1987, 1988)*; Southern California Association of Governments (1982, 1988i)

Amend the fourth paragraph as follows:

"Both SCE and LADWP are heavily dependent on oil, and natural gas, hydroelectric power, and coal for generation of electrical capacity. ~~Hydroelectric power and coal are other primary sources for these utilities. Because the predominant fuel used in generating electricity is oil, regional supply is highly sensitive to changes in oil prices and to potential disruption of oil supplies. Natural gas availability is highly variable because of changes in total supply and allocations by the State Public Utilities Commission to other sectors (residential uses have the highest priority and utility steam electric generating plants have the lowest priority).~~ Within the past decade, utilities in the region have substantially reduced their dependence on oil-fire generation by converting oil-fired plants to natural gas and adding coal and nuclear capacity. Oil is currently used only as a last resort, when natural gas is not available (Farris pers. comm.)."

Add the following to the fourth paragraph:

"In 1985, approximately 85 percent of energy statewide was generated from petroleum and natural gas. By 2005, it is projected that this share will decline to approximately 65 percent. During the same period, the proportion of the state's energy generated from geothermal sources and resources other than petroleum, natural gas, coal, hydroelectric, and nuclear is expected to increase from 2.3 to 11 percent (California Energy Commission 1987a)."

Amend the fifth paragraph, fifth line, as follows:

". . . water heating (Southern California Association of Governments 1982). Natural gas demand within the SCG service area in 1985 was approximately 495 bcf (California Energy Commission 1987)."

Amend the fifth paragraph, first line, as follows:

"Impact: Increased Electricity and Natural Gas Demand of ~~41,500~~ ^{60,740} Gigawatt-Hours and ~~260~~ ⁴⁸⁶ Billion Cubic Feet Per Year
Regional consumption of electricity is expected to increase by ~~41,500~~ ^{60,740} (54.5 79.8 percent) from 76,100 Gwh in 1980 to ~~117,600~~ ^{136,840} Gwh in 2010, and regional consumption of natural gas would increase by ~~260~~ ⁴⁸⁶ billion cubic feet (Bcf) (~~38.5~~ ^{72.0} percent) from 675 Bcf in 1980 to ~~935~~ ^{1,161} Bcf if 2010. . . ."

Amend the fifth paragraph, sixth line, as follows:

"In 1984, out-of-state sources have provided 84 percent of California natural gas supplies, including 66 percent from southwestern U. S. producers and 18 percent from Canada. By 2005, it is projected that 93 percent of the state's natural gas supplies will be provided by such sources, with southwestern U. S. producers' shares declining to

48 percent, Canada's share increasing to 33 percent, and Rocky Mountain and Mexican producers' shares at 10 and 2 percent, respectively (California Energy Commission 1987) ~~most of southern California natural gas supplies, with two companies (El Paso Natural Gas Company and Transwestern Pipeline Company) providing more than 75 percent of supplies between 1976 and 1979 (Southern California Association of Governments 1982).~~"

Amend the sixth paragraph, first line, as follows:

"~~Regional~~ Natural gas demand within the SCG planning area in 1985 was approximately 495 Bcf. . . ."

Page 6-60

Amend the first paragraph, third line as follows:

". . . increasing their reliance on ~~coal, nuclear power, and renewable~~ or alternative resources and technologies."

Amend the third paragraph, seventh line, as follows:

"~~LADWP's and SCE's~~ ~~SCE's and LADWP's~~ projections indicate. . . ."

Page 6-61

Amend the first bullet, second line, as follows:

". . . of the following measures, as needed:"

Amend the second paragraph, third line, as follows:

- "- reduce projected 2010 regional electricity demand by approximately 30 percent ~~overall future natural gas demand in the region by 15 percent or 111.62 Bcf/yr~~ through energy conservation;
- reduce projected 2010 regional natural gas demand by approximately 29 percent ~~overall future natural gas demand in the region by 15 percent or 111.62 Bcf/yr~~ through energy conservation;
- reduce projected 2010 regional residential, commercial, and industrial sector energy demand for electricity and natural gas as needed to accomplish the energy conservation objectives indicated above;
- ~~reduce annual residential sector demand by 25 percent or 8,500 Gwh and 73.22 Bcf per year by applying California Title 24 building standards and state and federal appliance efficiency standards to all new construction, require retrofitting of existing buildings (e.g., weatherstripping and insulation) as feasible, shifting consumption to off peak hours by developing~~

and implementing residential load management standards and rate adjustments (Southern California Association of Governments 1982);

- reduce total annual commercial sector demand by 30 percent or 10,000 Gwh and 23.14 Bcf per year by implementing Title 24 nonresidential building standards to all new construction; installing cost-effective energy conservation equipment in existing commercial buildings; and developing and implementing lighting and commercial appliance efficiency standards (Southern California Association of Governments 1982);
- reduce total annual industrial sector demand by 5 percent or 2,600 Gwh and 15.22 Bcf per year by implementing increased motor and operation and control efficiency standards; installing cost-effective energy conservation equipment on industrial facilities (e.g., boilers); and increasing agricultural pumping efficiency (Southern California Association of Governments 1982);
- provide incentives for cleaner and less energy-intensive industrial development; and promote cogeneration and other practices to reduce manufacturing and industrial energy consumption;
- increase the use of renewable and alternative energy sources (e.g., wind and geothermal) that generally are less capital-intensive and have shorter development lead times than conventional sources; and
- apply measures recommended in the AQMP that would reduce overall the generation of fossil fuel-based electricity within the air basin."

Page 6-62

Amend the first bullet, third line, as follows:

". . . the following measures, *as needed*:"

Page 7-19

Amend the fourth paragraph, ninth line, as follows:

"The following recommended mitigation strategy would ~~not~~ reduce the ~~traffic-congestion-impact~~ *all impact evaluation criteria, with the exception of vehicle hours of delay, to levels close to or better than those that existed in 1984, thereby reducing this impact to a less-than-significant level; however, it would substantially alleviate much of the problem. Therefore, this impact is unavoidable.*"

Page 8-28

Amend the third paragraph, first line, as follows:

"The 1982 AQMP. . . ."

Page 8-29

Amend the third column header of Table 8-14 as follows:

"Draft 1988 AQMP Target Emission Levels for Attainment of Standards"

Amend the fourth column header of Table 8-14 as follows:

"1982 AQMP Year 2000 Emissions with AQMP Control Measures"

Add the following footnote to Table 8-14:

"With the exception of CO, the emissions level ranges under the proposed project (with transportation mitigation) and GMA-1 (with transportation mitigation) are identical due to the relatively small proportion of total emissions that are from on-road vehicles. Emissions from stationary, area, and other mobile sources were held constant under the proposed project and GMA-1. (See the 'Methodology for Emissions Projections' section.)"

Page 8-32

Amend the third paragraph, third line, as follows:

" . . . below. ~~Both sets of mitigation measures would reduce the significance of this impact, but not to a less-than-significant level. Therefore, this impact is unavoidable.~~ Those two sets of mitigation measures are meant to encompass feasible transportation, stationary, area, and mobile source control measures. Implementation of both sets of mitigation measures would likely result in less-than-significant impacts for meeting federal CO, SO_x, and inhalable particulate matter standards. However, mitigation of impacts for ROG and NO_x are dependent on technological breakthroughs required by the Draft 1988 AQMP Tier III control measures. Since the feasibility of such breakthroughs is unknown at this time, impacts associated with ROG and NO_x are considered unavoidable. If technological innovations identified in the Draft 1988 AQMP do occur, then ROG and NO_x impacts would be mitigated to less than significant."

Page 8-33

Amend the first paragraph, third line, as follows:

" . . . could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14; however, it is highly unlikely that implementing these

measures could result in CO or-inhalable-particulate-matter emissions at or below the 1982 AQMP levels shown in Table 8-14.

Amend the third paragraph, fourth line, as follows:

" . . . could result in CO, SO_x, and inhalable particulate matter emission emissions at or below the target levels shown in Table 8-14, However,--it-is-highly-unlikely-that-implementing-these-measures could-result-in-ROG,--NO_x--or-SO_x--emissions-at-or-below-the-target levels thereby reducing impacts for these pollutants to a less-than-significant level. Attainment of federal ROG and NO_x standards is dependent on the technological and economic feasibility of implementing Tier III control measures."

Amend the sixth paragraph, third line, as follows:

" . . . considered a significant impact. The It is possible that implementing both sets of mitigation measures could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14. However, for CO the following mitigation measures would reduce this impact, but not to less than significant. Therefore, this the impact for this pollutant is considered unavoidable."

Page 8-34

Amend the fifth paragraph, second line, as follows:

~~"Implementation of the following mitigation measures could reduce this impact, but not to less than significant. Therefore, this impact is unavoidable.~~ Implementation of both sets of mitigation measures would likely result in less-than-significant impacts for meeting federal CO, SO_x, and inhalable particulate matter standards. However, mitigation of impacts for ROG and NO_x are dependent on technological breakthroughs required by the Draft 1988 AQMP Tier III control measures. Since the feasibility of such breakthroughs is unknown at this time, impacts associated with ROG and NO_x are considered unavoidable. If technological innovations identified in the Draft 1988 AQMP do occur, then ROG and NO_x impacts would be mitigated to less than significant."

Page 8-35

Amend the first paragraph, third line, as follows:

" . . . could result in CO, SO_x, and inhalable particulate matter emissions at or below the target levels, However,--it-is-highly-unlikely that-implementing-both-of-these-types-of-measures-could-result-in-ROG,--NO_x--or-SO_x--emissions-at-or-below-the-target-levels. thereby reducing impacts for these pollutants to a less-than-significant level. Attainment of federal ROG and NO_x standards is dependent on the technological and economic feasibility of implementing Tier III control measures."

Amend the third paragraph, fifth line, as follows:

" . . . considered a significant impact. ~~The~~ *It is possible that implementing both sets of mitigation measures could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14. However, for CO the following mitigation measures would reduce this impact, but not to less than significant. Therefore, this the impact for this pollutant is considered unavoidable.*"

Amend the fifth paragraph, third line, as follows:

" . . . ROG, NO_x, *inhalable particulate matter*, and SO_x emissions at or below the 1982 AQMP levels. However, it is highly^xunlikely that implementing both of these measures could result in CO ~~or-particulate-matter-emissions~~ at or below the 1982 AQMP levels.

Page 10-5

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Amend the second bullet, first line, as follows:

"o SCAG should ~~develop~~ *consider developing* a comprehensive. . . ."

Page 10-6

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-7

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-8

Amend the first bullet, second line as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-10

Amend the first bullet, first line as follows:

"o Local jurisdictions in the SCAG region should ~~adopt~~ *consider adopting* policies. . . ."

Amend the first bullet, first line as follows:

"o Local jurisdictions in the SCAG region should ~~adopt~~ *consider* adopting policies. . . ."

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Forsman, John C., Financial Management and Grants Administration Department Head, County Services Division of Los Angeles County, Los Angeles, CA. November 23, 1983 - letter to Mark Thomas, Executive Director, Southern California Association of Governments.

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APPENDIX

APPENDIX A - SUMMARY OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS

1. The information contained in the attached documents is classified as CONFIDENTIAL - SECURITY INFORMATION.

2. The information contained in the attached documents is classified as CONFIDENTIAL - SECURITY INFORMATION.

APPENDIX B - SUMMARY OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS

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APPENDIX I. RESPONSE TO COMMENTS RELATED TO THE MERITS OF THE DRAFT GROWTH MANAGEMENT PLAN

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
(11/14/88)

7. Pg. I-1: The Draft 1988 Air Quality Management Plan (September, 1988) on page 3-8 states, "The years 2000 and 2010 were chosen for baseline emission forecasts which indicate future emissions if no additional regulations were adopted after January 1, 1988." The page further states, "In Appendix III-D, SCAG's baseline growth forecast for population and employment is presented."
- Pg. I-3: An explanation of "restructuring" of growth management systems has been added in response to this comment.
- Pg. II-5: Figure headings have been changed in response to this comment.
- Pg. II-5: Figure II-4 represents total housing unit growth over five year periods.
- Pg. II-5: A line graph of regional housing trend and forecast has been added in response to this comment.
- Pg. II-6: This assumes there will be a real increase in personal income over the next 20 years with an adjustment for inflation.
- Decline in fertility rates among the Hispanic group is assumed to contribute to a smaller household size.
- Pg. II-6: Examples of wage and job skills will be added in response to this comment.
- Pg. II-8&9: County numbers are presented for population, housing and employment for all alternatives.
- Pg. IV-5: A balance of type of job with the price of housing may create better J/H balance and provide greater economic opportunity and/or affordable housing. SCAG is currently examining this issue for further consideration.
- Pg. VII-1: GMA-4 Modified levels were used in the AQMP (Pg. 4-10-41, Draft Environmental Impact Report 1988 Revision To The Air Quality Management Plan).
- Pg. VII-2: Matching the price of housing and household income may be a better indicator of J/H balance, the data is not readily available at this time. SCAG is currently examining this issue for further consideration.
- Pg. VIII-1: First, it must be demonstrated through an outreach and information system the benefits of J/H balance. J/H balance will be monitored on a yearly basis. Although not recommended in the GMP, it should be noted that the Southern California Air Quality Management

District could develop more stringent provisions and more vigorously enforce and Indirect Source Rule and New Source Review; the Regional Water Control Boards could expand the application of the national Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include State review of laws governing local general plans, and recommended changes to existing redevelopment laws.

Pg. VIII-1: Benefits of J/H balance will be highlighted through the Outreach process and a far-reaching educational effort. Also, consistency with the regional objectives of SCAG and CTC, can help in the approval of funds for facility projects and transportation improvements in their jurisdiction.

Pg. VIII-2: Representation in the Subregional Entities is in the local jurisdictions best interest, but not mandatory.

Pg. VIII-3: This time schedule would be in line with the implementation of the AQMP. The one year is recommended but not mandatory.

Pg. VIII-4: An example of "balance-promoting infrastructure improvement" will be added to the GMP in response to this comment.

Pg.VIII-4: Monitoring will be conducted by SCAG, with the assistance and review of local jurisdictions and the Subregional Entities.

Pg. A1-1: While cooperation of all jurisdictions is desired, the implementation process is voluntary to local jurisdictions.

Pg. A1-2: The issue of housing cost will be given further consideration

Pg. A1-2: The strategies and techniques presented in the GMP is a menu of action that can be undertaken by local jurisdictions to support the J/H balance objective. Local jurisdictions can choose from this list or develop their own to fit the condition. SCAG's task is to develop a menu of actions.

Pg. A1-4: Local jurisdictions should establish regional and local priorities for building the infrastructure needed to support J/H balance.

Pg.A1-4: Strategy 4b should be implemented by local jurisdictions, however, SCAG could incorporate this strategy into its plans and the A-95 Review process.

Pg. A1-4: Participation in SCAG and the subregional entities could allow affected agencies to provide input as well as a system that will resolve conflicting priorities.

Pg. A1-5: Incentives would be provided to commercial and industrial developer in job-poor areas and to residential developers in housing-poor areas. Exactions would be imposed to commercial and

industrial developer in job-rich areas.

Pg. A2-3: While participation is voluntary, local jurisdictions should develop general plans that incorporate regional and local J/H balance objectives.

Pg. A2-5: Review by a regional authority may slow the process, however it assures conformity with regional goals and objectives.

Pg. A2-8: This can be decided by the local jurisdiction.

Pg. A2-24: This could be a measure used by a local jurisdiction that is in a housing-rich subregion, but the Regional Housing Needs Assessment does not take into account growth limitation measures in the determination of housing needs.

RESPONSES TO THE COMMENTS OF THE CITY OF ANAHEIM
(11/17/88)

14. The GMP will be adopted at the subregional level, however, small area forecasts (i.e. city, census tracts) will be developed by SCAG's Small Area Forecast Model for technical purposes. City forecasts will be available in January of 1989.
15. The Baseline projection is based on trend from 1970 to 1984. In order to incorporate more recent data, 1984 to 1988, the GMA-4 Mod Trend projection was developed. (See the GMP). The preferred alternative, GMA-4 Mod. J/H, reflects the J/H balance policy, thus increasing population and housing and lowering employment relative to the Trend projection.
17. The final GMP will include a list of cities and subregions. The GMP identifies job-rich/housing-poor and housing-rich/job-poor only at the subregional level.

The GMP does not present J/H balance at the city level, however, the City of Anaheim is split by the Northwest Orange Co. Subregion and Southeast Orange Co. Subregion--both are currently job-rich/housing-poor.

SCAG is currently examining the issue of matching job type with housing costs for future consideration.

This can be accomplished by targeting labor force retraining programs in job-poor localities.

Each local jurisdiction will have different policies related to J/H balance for their subregion. All the local policies cannot be presented in the GMP, but can be found in local general plans.

18. Implementation of J/H balance is undertaken by local jurisdictions. A city which is impacted either on the housing or on the job side will not be compelled to grow beyond its capacity. Within a subregion, local jurisdictions can trade targets and negotiate measures. Cities are provided with a choice of measures and they can develop their own measures that are applicable to their own situation.

Both the A-95 Review program and the Transportation Improvement Program review projects for consistency with the adopted SCAG forecasts, plans and policies.

What is proposed is a goal not local implementation standards. Appropriate local review criteria are needed.

Anaheim is in a job-rich subregion. Permit issuance would be handled through the local permitting process. If it does not meet performance goals and contributes to J/H imbalance, local jurisdictions could require mitigation measures (i.e. conditional permits). Cities would

be responsible for assuring land use compatibility.

Such project approvals would be based upon there being no undue restraints on development, whether they be infrastructure, environmental or other considerations.

Mitigation measure such as conditional permits could provide infrastructure improvements. Cities can negotiate trades on performance goals so as not to penalize balanced communities.

This would require inter-agency coordination but not create a new regulatory body.

All measures are intended to impact new industries, not push or pull existing industries that are currently operating in a jurisdiction.

Incentive measures can be found in Appendix 1 and 2 of the GMP.

Encourage jurisdictions in job-rich subregions with housing quotas and building permit limitations to ease their ordinances. It would not have an impact of the quality of housing built.

Transportation demand management measures would provide accessibility between residential and employment areas.

19. The methodology used in developing the J/H balance numbers by subregions is explained in the GMP. The data is through 1988 from the State Dept. of Finance for population and housing, and employment data is from the State Employment Development Dept.

20. See previous responses.

RESPONSES TO THE COMMENTS OF THE CITY OF ONTARIO
(11/17/88)

27. For greater clarification of implementation, see the revised Implementation chapter of the GMP.

Implementation of J/H balance by local jurisdictions is voluntary; however, cities should develop general plans that incorporate regional and local J/H objectives as well as elements of the Air Quality and Regional Mobility Plans. SCAG, through the A-95 Review program can influence the issue of federal resources to a project which adversely impacts the J/H balance in a subregion. The Transportation Improvement Program is another mechanism that can be used by SCAG. SCAG can recommend that funds for transportation projects be consistent with the objectives of the J/H balance policy.

Furthermore, if by January 1, 1994, it is estimated that the J/H imbalance performance goals will not be met, the performance goals, and measures to attain them, could be reassessed. For areas where J/H balance has worsened, additional implementation measures could be considered. Also, while not recommended in the GMP, the Southern California Air Quality Management District could develop more stringent provisions and more vigorously enforce and Indirect Source Rule and New Source Review; the Regional Water Control Boards could expand the application of the national Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include State review of laws governing local general plans, and recommended changes to existing redevelopment laws.

28. Any additional authority granted under indirect source legislation would strengthen the potential for implementing air quality control strategies. Adoptions of such legislation may preclude the need for a voluntary implementation program.

RESPONSES TO THE COMMENTS OF THE IRVINE COMPANY
(11/18/88)

32. The GMA-1 Alternative (Baseline/No Project) was used in both the analysis of the J/H balance impacts and the modeling of transportation impacts.

J/H balance results in substantial improvements on the transportation system and the regional air quality over the Baseline projection. J/H balance reduces commute distance (VMT) by 33.4 million miles/day (8.5%) which in turn reduces ROG (reactive organic gases) emissions from mobile sources by 46.5 tons/day.

33. For purpose of comparing the impacts of alternative distributions, the configuration of subregions were kept the same. Forecasts will be prepared for levels smaller than the subregion (i.e. cities) at a later date.

Since the EIR is a regional study, it is general in scope and include limited analysis of subregional impacts. Identification and evaluation of impacts in service districts and jurisdictions within the region should occur in subsequent environmental assessments for proposed land use plans, facility plans, and development projects.

34. A socio-economic impact analysis will be completed in early December of 1988 and will be included as part of the EIR.
35. Specific growth levels or performance goals are not mandated but are developed through the cooperation of local jurisdictions, subregional entities and SCAG. Also, cities may elect to trade their performance goals with other cities within the subregion so long as the subregional incremental ratio is maintained.

The intent of the J/H balance policy is to improve the transportation system and the air quality over the Baseline or Trend projection, which assumes continuation of market forces. If market forces and trend continued, the region's transportation and air quality would be significantly worse. However, with the implementation of J/H balance, commute distance is reduced by 33.4 million miles/day and reactive organic gases emissions from mobile sources by 46.5 tons/day.

In response to the comment that Orange County "export" worker, the GMP forecast of employment in Orange County has been revised.

The regional jobs/housing balance proposal should be viewed as a mitigation measure to minimize or reduce environmental impacts. Implementation of balance is very difficult and may ultimately require major regulatory or legislative changes. Clearly, there are benefits if balance can be implemented.

In response to the comment, that J/H balance could be defined by performance standards, the Implementation chapter of the GMP was revised. In place of J/H balance targets, incremental J/H balance

ratios will be used as a standard for evaluating the progress of the J/H balance policy. Incremental J/H balance ratio is a performance goal.

SCAG will continue to use the GMA-4 Mod. J/H regional total in the GMP based on both technical and legal reasons.

SCAG's GMP is based the GMA-4 Mod. J/H alternative which forecast 18.3 million people by the year 2010--about 1.2 million higher than the State Dept. of Finance's projection of 17.1 million. Most of the differences between the DOF and SCAG levels of growth are due to differences in methodology and assumptions, specifically, natural increase. The SCAG forecast assumes births, deaths and migration rates by ethnicity. In order to achieve the DOF total, all the ethnic fertility rates had to be merged to the projected white rate in the year 2010, the survival rates were also lowered and the in-migration to the region was reduced to maintain the same net migration levels. Demographic experts and SCAG believe that our set of assumptions are better for the region than DOF's.

This lower regional total (17.1 million) is presented in the GMP as an alternative (GMA-LOW J/H) and assessed in the EIR.

We have reviewed current legislation and administrative policies related to consistency in the use of population projections. Our conclusion is that the region can develop and use its own growth projections for air quality, housing, transportation and water quality planning.

Local jurisdiction can choose the implementation measure that best achieves J/H balance. Also, jurisdictions can negotiate performance goals and measures with other jurisdictions in their subregion--allowing more job growth in one and housing in another. Local jurisdictions could grant permits to projects that lead to an excess of jobs on the conditions that:

- the performance goals and incremental J/H balance ratios are maintained,
- mitigation measures insuring housing development and/or balance promoting infrastructure improvements.

RESPONSES TO THE COMMENTS OF THE LOS ANGELES COUNTY SANITATION DISTRICTS
(11/18/88)

37. The GMP will be adopted at the subregional level, however, small area forecasts (i.e. city, census tracts) will be developed by SCAG's Small Area Forecast Model for technical purposes. Small area forecasts will be available in January of 1989.

The 2010 daily wastewater treatment capacity surplus and shortfalls are based on 2010 county population projections; 2010 per capita ADWF by county; and 2010 wastewater treatment capacity, including all existing plus funded capacity programmed for construction as of 1985. Many districts have expansion plans that are unfunded; these have been excluded because of their uncertainty. Shortfalls are based on the difference between projected ADWF and capacity, but would be more severe than indicated since treatment plants must be sized to handle peak flows, which can be up to 25 percent higher than ADWF. Capacity figures listed also do not reflect type of treatment capability.

We recognize that the wastewater agency's responsibility is to attain an acceptable levels of wastewater treatment in accordance with the Clean Water Act and SWRCB regulations; however, the phasing and timing of development in this region is largely dependent upon wastewater treatment expansions. The intent of the GMP is to define the desirable rate of growth for the region in order to accomplish the J/H balance objective.

Chapter III, Summary of Baseline Impact Assessment has been deleted in the GMP to avoid confusion with the EIR. The EIR present an impacts for all alternatives presented in the GMP, including Baseline (GMA-1).

For the past several years, SCAG has requested funding from the State Water Resources Control Board (SWRCB) for 208 Plan updating. Thus far, SWRCB has not funded these requests. If funds can be made available, the 208 Plan should be updated and made in conformance with SCAG's growth management plan. The plan update may be prepared for the entire region, or incrementally by water basins. Until the 1979 208 Plan is updated, SCAG will be limited to reviewing future water projects based on the 1979 Plan.

Implementation of J/H balance is based on the voluntary participation of local jurisdictions. Local jurisdictions select the measures necessary for the achievement of J/H balance targets. While not recommended in the GMP, the Southern California Air Quality Management District could develop more stringent provisions and more vigorously enforce and Indirect Source Rule and New Source Review; the Regional Water Control Boards could expand the application of the national Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include State review of laws governing local general plans, and recommended changes

to existing redevelopment laws.

SCAG recognizes the limitation of regulating infrastructure through funding, however, the RWQCB and the SWRCB do set priorities for funding of most wastewater facilities and is thus the best tool we have for influencing infrastructure extensions consistent with SCAG's growth forecast. SCAG's 208 Plan is also intended to look at the relationship between land use development and infrastructure capacity, however, SCAG has not been able to revise this document.

RESPONSES TO THE COMMENTS OF THE COUNTY OF ORANGE EMA
(11/18/88)

47. The implementation process proposes that cities will decide on whether to grant housing and commercial/industrial permits. Implementation of J/H balance is undertaken by local jurisdictions. A city which is impacted either on the housing or on the job side will not be compelled to grow beyond its capacity. Within a subregion, local jurisdictions can trade performance goals and negotiate measures. Cities are provided with a choice of measures and they can develop their own measures that are applicable to their own situation.

Private interest groups are envisioned as a part of the Subregional Entity and will participate in the J/H balance implementation process. Included in the menu of measures are incentives for developers to build housing in job-rich areas and commercial/industrial facilities in job-poor areas. (See Appendices 1 and 2).

Modifying components of local general plans which would re-distribute existing pattern of land use in areas that are as yet undeveloped is an option that local jurisdiction may choose. Local jurisdictions have the option to choose implementation measures appropriate to the local condition.

50. Funding should come from federal, state and local agencies that have responsibilities for implementing their general plans.

A menu of implementation measures are listed in Appendices 1 and 2 of the GMP.

RESPONSES TO THE COMMENTS OF THE CITY OF POMONA
(11/18/88)

51. The GMP will be adopted at the subregional level and not at the city level. The methodology used in developing the J/H balance numbers by subregions is explained in the GMP. The data is through 1988 from the State Dept. of Finance for population and housing, and employment data is from the State Employment Development Dept.

The city forecast based on GMA-4 Mod. J/H will be developed in January, 1989 for technical purposes. In 1987 and 1988, SCAG sent surveys to all the jurisdictions in the region asking for data and input; however, no comments were recieved from the City of Pomona.

The SCAG's RHNA subcommittee and the CEHD committee approved the City of Pomona's request to lower future housing need based on limited site availability. However, no changes will be made to the subregional numbers on account of the Pomona's RHNA revision.

52. The data used to determine future growth was based on the population and housing trend data from the DOF, local input and the J/H balance policy. On account of the J/H balance policy (GMA-4 Mod. J/H), the Trend projection for East San Gabriel Valley subregion was reduced.

RESPONSES TO THE COMMENTS OF THE CITY OF REDLANDS
(11/18/88)

53/54. Since the basis of housing market demand is in existing and past trends, the GMP utilizes this information in projecting future growth.

Housing price differentials between inland and coastal areas for single and multifamily housing are not the only influences on preferences for home location. Desirable places to live, such as the City of Redlands, for instance, are attractive place for different households for different reasons. We have no basis for determining how many people would live elsewhere, if just relatively more housing were available, without examining the whole pattern of past housing and life style choices. This bit of history is best expressed and summarized as market demand.

55. Communities will not be penalized for achieving J/H balance at relatively faster or slower rates. Several indicators of progress towards achievement of J/H balance performance goals will be evaluated through the monitoring process.

RESPONSES TO THE COMMENTS OF THE CITY OF SANTA ANA
(11/18/88)

56. Orange County's GMA-4 Mod. J/H employment forecast has been revised up, thus the county and cities will continue to show significant job growth.

Local jurisdiction may approve projects that lead to an excess of jobs on the condition that: performance goals and incremental J/H balance ratios be maintained; and that mitigation measures insure housing development.

57. SCAG does not recommend these actions in its implementation process; however, the SCAQMD could potentially develop more stringent provisions of and more vigorously enforce an Indirect Source Rule and New Source Review.

58. A socio-economic impact analysis will be completed in early December of 1988.

59. The GMP will be adopted at the subregional level, however, small area forecasts (i.e. city, census tract) will be developed by SCAG Small Area Forecast Model for technical purposes. City forecasts will be available in the latter part of January 1989.

60. The monitoring section of the Implementation chapter has been revised. The monitoring process will evaluate the effectiveness of chosen implementation measures towards accomplishment of the performance goals. For more detail explanation, see the Final GMP.

61. The implementation process proposes that cities will decide on whether to grant housing and commercial/industrial permits. Implementation of J/H balance is undertaken by local jurisdictions. A city which is impacted either on the housing or on the job side will not be compelled to grow beyond its capacity. Within a subregion, local jurisdictions can trade performance goals and negotiate measures. Cities are provided with a choice of measures and they can develop their own measures that are applicable to their own situation.

62. Local jurisdictions should develop general plans that incorporate regional and local J/H balance objectives and elements of the Air Quality Management Plan and the Regional Mobility Plan.

Rather than create a new agency, the GMP recommends the formation of subregional entities. (See the Implementation Chapter of the Final GMP for details.)

Refer to response #56 (in response to Item C., Page 3-85 of Comment Letter).

While not recommended in the GMP, the Southern California Air Quality Management District could develop more stringent provisions and more

RESPONSES TO THE COMMENTS OF THE CITY OF SANTA ANA
(11/18/88)

62 (continued).

vigorously enforce and Indirect Source Rule and New Source Review; the Regional Water Control Boards could expand the application of the national Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include State review of laws governing local general plans, and recommended changes to existing redevelopment laws.

63. Refer to responses #56 and 57; Tax-revenue sharing is listed as an implementation measure in Appendix 1 of the GMP.
64. Refer to response #59. The methodology used to develop the GMA-4 Mod. J/H alternative is discussed in the chapter on Recommended Alternative of the GMP.
65. J/H balance can be attained because the implementation process is politically feasible. Implementation is carried out by existing authorities that are guided by presently available regulatory measures. Also, participation by local jurisdictions is voluntary. Many of the measures are already being implemented by local jurisdictions. For example, within Southern California, at least 29 local jurisdictions are explicitly using infrastructure funding as a growth management technique. (Based on a SCAG survey conducted in 1984).

The GMP only provides the opportunity to live and work in accordance with distribution of J/H balance.

The socio-economic impact analysis will address these points. It will be completed in early December of 1988.

The intent of the J/H balance strategy is to redirect growth, jobs to housing-rich and housing to job-rich area, because free market forces alone would show greater J/H imbalance in the future.

Implementation is carried through by existing authorities and guided by available regulatory measures, with consideration of incremental legislative action if local action fails.

Refer to SCAG's Regional Housing Need Assessment

As part of the proposed implementation process the first step is to initiate an Outreach Program that will muster regionwide support for the J/H balance strategy.

COUNTY OF VENTURA SOLID WASTE MANAGEMENT DEPT.
(11/18/88)

89. Chapter III of the GMP (Baseline Impact Assessment) has been deleted to avoid confusion with the EIR which includes impacts for all alternatives, including GMA-1 (Baseline).

The Ventura County General Plan was used as input into the Baseline projection.

The EIR has been changed to reflect this comment. The correction can be found in the ERRATA pg. 6-25.

RESPONSES TO THE COMMENTS OF THE PUBLIC HEARING ON NOVEMBER 3, 1988

99. Subsequent to the hearing, the City of Fullerton received copies of all documents it formally requested.

101. Refer to Response #105.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
COUNTY OF ORANGE--Bill Gayk
(11/18/88)

105. SCAG will continue to use the GMA-4 Mod. The J/H regional total in the GMP is based on both technical and legal reasons.

SCAG's GMP is based the GMA-4 Mod. J/H alternative which forecast 18.3 million people by the year 2010--about 1.2 million higher than the State Dept. of Finance's projection of 17.1 million. Most of the differences between the DOF and SCAG levels of growth are due to differences in methodology and assumptions, specifically, natural increase. The SCAG forecast assumes births, deaths and migration rates by ethnicity. In order to achieve the DOF total, all the ethnic fertility rates had to be merged to the projected white rate in the year 2010, the survival rates were also lowered and the in-migration to the region was reduced to maintain the same net migration levels. Demographic experts and SCAG believe that our set of assumptions are better for the region than DOF's assumptions.

This lower regional total (17.1 million) is presented in the GMP as an alternative (GMA-LOW J/H) and assessed in the EIR.

We have reviewed current legislation and administrative policies related to consistency in the use of population projections. Our conclusion is that the region can develop and use its own growth projections for air quality, housing, transportation and water quality planning.

The Air Quality Management Plan (AQMP), Growth Management Plan (GMP) and the Regional Mobility Plan (RMP) are all scheduled for adoption on December 15, 1988. The Regional Housing Needs Assessment (RHNA) was adopted by the Executive Committee in June of 1988. The RHNA is based on the GMP's forecast (GMA-4 Mod. J/H).

The employment forecast for Orange County has been changed in the GMP in response to this comment. (See GMP for final employment figures.)

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
REGIONAL ADVISORY COUNCIL--Margo Koss
(11/18/88)

105. We agree that funding for the GMP subregional planning process should come from federal, state and local agencies that have responsibility currently for implementing of the major regional plans.

The implementation of the AQMP will require extensive regional and subregional cooperation. It may entail the formation of new planning groups or governmental entities. The funding for this process is to be determined as the process is defined.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
KEN BAUER
(11/18/88)

105. The function of SCAG is to examine development, transportation, environmental, economic issues from a regional and subregional perspective. The A-95 Review process, examines the impacts from the the individual project but also the cumulative effects--what are the effects when combined with other projects in the subregions. Also, the three SCAG Plans are regional in scope and require both regional and subregional analysis.

This comment cannot be directly addressed in the GMP, however, impacts of growth on education is presented in the GMP EIR.

One of the GMP policies is to encourage growth to occur in and around:

- activity centers
- transportation nodes and corridors
- underutilized infrastructure systems
- areas needing recycling and redevelopment

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
BILL WREN
(11/18/88)

105. The outlying areas of the region (i.e. San Bernardino and Riverside Counties) are part of the SCAG and thus are included in all of SCAG's analyses. A major focus of the GMP is J/H balance, which emphasizes the importance of employment growth in job-poor areas such as San Bernardino and Riverside Counties.

For the response to how jobs will be effected by the air plan, please refer to the AQMP EIR.

Urban form is discuss in Appendix 3 of the GMP and stated in a policy. Because of the limited availability of land use information at this time an urban form map cannot be presented. Based on SCAG's Geographic Information System--which is currently being developed--SCAG will have the capability to produce land use maps for the region that are based on local general plans.

The GMP promotes the growth of a certain number of jobs and housing in part of the region through incentives and other J/H balance measures. The GMP provides the opportunity for people to move.

J/H balance as a policy is feasible since it is proposed that it be carried through voluntarily by existing entities and guided by presently available regulatory measures.

Cities have the option to choose form the provided menu of measure or they can develop their own measures that are applicable to their own situation.

The GMA-4 Mod. J/H forecast does emphasize job growth in job-poor/housing-rich areas through implementation measure such as enterprise zones, infrstructure funding and incentives.

The Trend projection show that a large proportion of the population growth will be in the inland counties by the year 2010, while employment growth will center around the coastal counties. However, with the J/H balance policy, growth patterns are forecast to shift, with more jobs going to San Bernardino and Riverside Counties and more housing units to Los Angeles and Orange Counties. Even with the shifts due to the J/H balance policy, the inland counties will have significant population growth.

The AQMP is based on the distribution of the GMA-4 Mod. J/H alternative of the GMP (Executive Committee approval 5/30/88).

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
BILL WREN
(11/18/88)

105 (continued).

If market forces and trend drove the region's future growth patterns, the transportation system and the air quality of the region would become significantly worse than today. However, implementation of J/H balance would result in the reduction of commute distance by 33.4 million miles/day and reactive organic gas emissions from mobile source by 46.5 tons/day.

Regarding the awkwardness of moving businesses and New Source Review, a new NSR rule will be workshopped in early 1989 which, if approved, will address this concern.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
MINORITY COALITION OF RESPONSIBLE GROWTH
FRED FUJIOKA
(11/18/88)

105. The Growth Management Plan through the proposed job/housing balance policy and its implementation is designed to avoid exacerbation of present inequities by encouraging housing development and redevelopment and promote accessible housing by ensuring an adequate supply where it is needed.

The Growth Management Plan job-housing balance policy is designed to ensure a more even distribution of employment and housing opportunities throughout the region by promoting growth in housing and housing types near where people work, growth in employment near where people live and where more employment opportunities are needed. By increasing the housing stock to adequately meet the needs of the growing population housing becomes more accessible and more affordable.

The Growth Management Plan is developed to avoid the socio-economic polarization of the region. This issue is developed in one of the appendices of the report.

The implementation of the J/H balance strategy is first carried out by existing authorities that are guided by presently available regulatory measures. Also, participation by local jurisdictions is voluntary, however, if local actions fail, then regulatory bodies (i.e. South Coast Air Quality Management District, Regional Water Control Boards, State Housing and Community Development Department) could develop more stringent provisions and more vigorously enforce rules and laws.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
CITY OF FULLERTON
JOEL ROSEN
(11/18/88)

105. The implementation of the J/H balance strategy is first carried out by existing authorities that are guided by presently available regulatory measures. Also, participation by local jurisdictions is voluntary. Many of the measures are already being implemented by local jurisdictions. For example, within Southern California, at least 29 local jurisdictions are explicitly using infrastructure funding as a growth management technique. (Based on a SCAG survey conducted in 1984).

SCAG is currently examining the issue of matching job type with skill of worker for future consideration.

The issue of mobility and air quality is addressed in the RMP and AQMP respectively. The GMP addresses the issue of J/H balance--job growth in job-poor areas and housing growth in housing-poor areas. Better mobility and better air quality are the objectives and J/H balance is the way to achieve these objectives. GMA-4 Mod. J/H, which reflects J/H balance policy, improves VMT by 33.4 million miles/day, which in turn reduces ROG emissions from mobile sources by 46.5 tons/day.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
DORIS BRADSHAW
(11/18/88)

105. SCAG concurs that no agency should proceed in violation of the nation's established air quality standards; however, this issue is not pertinent to the review of the GMP and RMP, and respective EIRs, and deals with an issue over which SCAG has no authority.

The issue of growth and flooding is addressed in the GMP EIR (See Chapter 11).

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
ONTARIO CHAMBER OF COMMERCE
(11/17/88)

105. The AQMP is based on the distribution on the GMA-4 Mod. J/H alternative of the GMP (Executive Committee approval 5/30/88).

This match of type of job with price of housing is currently being examined for future consideration.

The RHNA was based on the GMP's GMA-4 Mod. J/H forecast.

The data used in the development of the Baseline projection was the State DOF population and housing estimates. Annual data from DOF was only available from 1970.

Policy 6 (encouraging growth in and around center, nodes, corridors) is consistent with the J/H balance policy. This policy encourages the growth forecast for the subregion to occur in and around center. The subregional forecast reflect J/H balance.

The contingency analyses were prepared discussion purposes and not a recommendation in the GMP.

The regional employment total for the Baseline projection (1970-1984) and the GMA-4 Mod. Trend projection (1970-1988) are the same, however, county and subregional distributions vary.

No implementation measure is required of the local jurisdiction. It is the jurisdictions choice on which to implement. Appendices 1 and 2 are menus of possible implementation measure from which local jurisdiction can choose from.

The purpose of the monitoring process is to provide feedback on effectiveness of chosen implementation measure towards accomplishment of the J/H balance performance goals.

Incentives are listed in Appendices 1 and 2 of the GMP.

The funds could be dispersed by a variety of existing agencies or possible new agencies: local governments; special district; a regional joint-power authority; and/or the state.

Their would be an incremental J/H balance ratio for the subregion. Cities within a subregion, with the participation of subregional entities if they so elect, can trade performance goals as long as the subregional incremental ratio is maintained.

RESPONSES TO COMMENTS AT THE NOVEMBER 18TH, 1988 PUBLIC HEARING
ONTARIO CHAMBER OF COMMERCE
(11/17/88)

105 (continued).

The implementation of any measure will be the decision of the local jurisdiction. If a jurisdiction is in a subregion where the implementation of an enterprise zone would be inconsistent with the AQMP, another measure might be used.

#11: We agree, the issue of cost of housing and type of job is currently being examined for future consideration.

#13: Feasibility to implement is based on current LAFCO guidelines for incorporation.

#16: Cities can still pursue redevelopment as long as they continue to achieve the J/H balance performance goal.

A(2): The Growth Management Plan is flexible to include all cities.

A(3): We agree. SCAG's implementation process would not require local jurisdiction to conform, it would be on a voluntary basis, however, SCAG does review projects for conformity with SCAG's plans.

GMP policy encourages growth to occur in and around activity centers, transportation nodes and corridors.

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